



# **HERTSMERE**

## **LOCAL PLAN**

**Green, sustainable growth: Towards 2040**

**Assessment and comparison of Green Belt  
housing and employment sites**

**March 2024**

## Assessment and Comparison of Green Belt sites

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## **Executive summary and purpose of the report**

The assessment and comparison of sites is the first stage in the updated site selection process for the revised Local Plan. The output from this process is a site comparison matrix for housing and employment sites. Each site is given a matrix score according to how well it performs in relation to Green Belt and other environmental factors. The relative scores achieved by each site have informed the process of making final site selections for the Regulation 18 consultation being undertaken in 2024.

### **Reason for the report**

The 2021 draft Local Plan sought to deliver the full Local Housing Need figure arising from the Government's standard methodology – 12,160 homes over the plan period, 760 per year. With brownfield sites only able to contribute around 25% of the housing target, the majority of suitable and available Green Belt sites needed to be allocated.

The quantum of development proposed and consequential area of land to be removed from the Green Belt generated an unprecedented level of public interest in the draft 2021 Local Plan. The Council set the plan aside in early 2022 and subsequently reviewed its approach to the identification of land for development, deciding on a Green Belt-performance led approach.

This meant that all Green Belt sites – at whatever stage they had been promoted or identified for housing purposes - needed to be assessed and compared as the first step in the site selection process for the 2024 Local Plan.

### **Process**

In the interests of treating the assessment of all sites in a consistent and robust manner, they were all assessed against a number of criteria. Whilst a primary indication of whether sites had the potential for allocation was their performance in Green Belt terms, such as stopping the coalescence of settlements, other non-Green Belt factors also needed to be considered for the process to be robust.

The most effective and transparent way of understanding and presenting the outputs from this process was considered to be the creation of a site comparison matrix. Sites were assessed both quantitatively and qualitatively using published technical evidence and, where required, an officer judgement to assign scores for each site in relation to each criterion. Details of how sites were assessed and scored in relation to each of these factors are set out in the report.

### **Taking the Outputs forward**

The outputs from the assessment and comparison process have informed the site selection process, with higher scoring sites more likely to be suitable for allocation. However, these outputs do not constitute the entire site selection process. Other factors, as indicated in paragraph 12.2, have also been considered in arriving at the draft allocations in the 2024 Local Plan. Whilst exceptional circumstances justifying development in the Green Belt are considered to exist at a strategic level, given the limited availability of brownfield land, the case for each individual site will need to be established prior to decisions being taken on the final (Regulation 19) allocations.

## **1. Introduction**

- 1.1. The previous September 2021 draft Hertsmere Local Plan set out a strategy, which included site allocations, based on meeting the full local housing need identified through the government's standard method. The standard method resulted in a housing need figure for Hertsmere of 724 dwellings a year; a total of 12,160 dwellings over the plan period 2022 to 2038.
- 1.2. The 2021 draft-Plan prioritised sites within the urban area and sought to optimise densities, but even so only around 25% of the housing target could be accommodated in those areas. Consequently, the 2021 draft-Plan envisaged a significant proportion of the identified need having to be met on sites within the Green Belt.
- 1.3. Following public consultation on the 2021 draft-Plan from October to December 2021, the Council made the decision to set this plan aside in light, inter alia, of significant concerns over the quantum of development proposed in the Green Belt, and a strong desire to minimise the impact of development within the Green Belt. Consequently, there has been a need to re-consider both:
  - The overall quantum of development which the Local Plan will seek to deliver; and
  - The individual site allocations that make up the strategy.
- 1.4. The first of these includes an assessment of (a) whether there is any local justification to set a different housing level of housing need to that established through the government's standard method and (b) the subsequent, but separate, identification of relevant targets that the Local Plan will seek to deliver.
- 1.5. Secondly, alongside this and in the context of the reasons for the current plan being set aside, the selection of sites has been re-considered. A site comparison assessment has been undertaken in order to inform decisions about which sites will most appropriately deliver growth within the context of the Local Plan spatial strategy.

## **2. Draft Plan – Evolution of Spatial Strategy**

- 2.1. The spatial strategy sets the framework within which Hertsmere aims to meet its development needs, in line with the Local Plan Vision and Strategic Objectives. These were first published in 2021 with some minor changes to the proposed Vision and Objectives included in the additional Regulation 18 consultation in 2024. The revised 2024 Vision and Objectives are set out in Appendices 1 and 2 to this report.
- 2.2. Arising out of this, the guiding principles for the spatial strategy, which remain valid, are that development should:
  - Meet identified needs sustainably in locations which are or can be made to be the most accessible and have the greatest capacity to absorb growth and deliver social, economic and environmental benefits, including required infrastructure, for existing and new communities;
  - Be planned and located so as to maximise the protection and enhancement of Hertsmere's most valued characteristics – including its landscape, views, heritage, ecology and habitats,

the unique character of the individual settlements within the borough and to recognise the importance of the Green Belt for maintaining this character;

- Be planned and located so as to maximise resilience against climate change, reduce and mitigate its impacts; and
- Be planned and located so as to enable local communities to embrace healthy, active, connected and fulfilling lifestyles.

2.3. An overall approach to locating development in line with the above was originally consulted on at First Steps and Issues and Options stages as follows:



2.4. The approach was subsequently refined and consulted on at regulation 18 draft plan stage in 2021. As a result, the draft plan distributed development across the following location types, in a manner consistent with the borough's Settlement hierarchy<sup>1</sup>. The emerging plan has been subject to an iterative process of SA/SEA<sup>2</sup>.

<sup>1</sup> See section 7

<sup>2</sup> SA/SEA at Scoping, Issues and Options, Potential Sites for Housing and Employment and Regulation 18 Draft Plan stages – see [Supporting Studies \(Local Plan evidence base\) - Hertsmere Borough Council](#)

Location type	Settlements	Position in settlement hierarchy	Comments
Redevelopment of urban brownfield sites	Borehamwood & Elstree, Bushey, Potters Bar and Radlett	Tier 1, 2, 3	Maximising use of brownfield sites and optimising densities whilst ensuring development is appropriate to the local context. Development here benefits from accessibility to existing services and sustainable modes of transport thus reducing the need to travel and contributing to increasing climate change resilience.
New sustainable neighbourhoods and neighbourhood extensions	Borehamwood & Elstree, Bushey, Potters Bar and Radlett	Tier 1, 2, 3	New sustainable neighbourhoods, at least one site in/adjoining each settlement being large enough to support the provision of on-site infrastructure. Sites are prioritised which <ul style="list-style-type: none"> <li>demonstrate higher levels of accessibility</li> <li>contain an element of PDL</li> <li>contribute least to Green Belt purposes and where least harm will result from development,</li> <li>offer the required quantum of development to secure improvements to infrastructure; and</li> <li>minimise and/or mitigate any negative impact on the local environment</li> </ul>
Supporting larger rural communities and growth of key villages	Elstree, Shenley and South Mimms	Tier 4, 5	Growth in the borough's main villages to create more sustainable and self-contained communities. Sites allocated are appropriate to the size and character of the existing villages with priority to the most sustainable, including where harm to the Green Belt is minimised.
Meeting the needs of other villages	Smaller washed over villages and hamlets	Tier 6, 7	Some limited opportunities for small scale residential development – the resultant increase in population will help to maintain settlements' long-term viability, particularly where new affordable housing can be secured. Significant amounts of development are acceptable in terms neither of character, nor of sustainability (lack of accessibility by sustainable transport and absence of day-to-day facilities and services).
New settlement			Self-sustaining, balanced new community. The settlement will be comprehensively planned, and provide key infrastructure which will facilitate more localised living and a reduced need to travel; reliance on the private car will also be reduced through securing high quality sustainable transport connections within the settlement itself and with nearby settlements. Development will be planned so as to ensure least harm possible to the Green Belt

2.5. As part of a balanced approach to accommodating growth, the draft plan in 2021 set out that all of the main settlements should accommodate at least one strategic site, with smaller settlements also taking a level of growth that could be supported by existing infrastructures capacities, or would help sustain rural communities.

2.6. Given the dispersed pattern of settlements, landscape character and extent of the Green Belt across the borough, this overall approach of distributing development across the 5 identified types of location, with priority to non-Green Belt locations, remains an appropriate starting point for locating development across the borough in the revised version of the draft plan. The

relative amounts of development proposed in each category of area and geographical part of the borough will reflect any revisions to the Plan's overall Vision and Objectives, development targets within it, and site specific factors including Green Belt performance, environmental/sustainability criteria and any other factors applied during the site selection process.

## **Housing Sites**

### **3. Set-aside Draft Local Plan – Site selection**

- 3.1 The sites allocated in the previous draft plan were those assessed as suitable, available and deliverable that provided the best fit with this overall spatial strategy, would deliver the housing target (the full local housing need calculated through application of the government's standard method) and, where located in the Green Belt, exceptional circumstances justifying a change to Green Belt boundaries could be demonstrated.
- 3.2 In line with national policy<sup>3</sup>, case law<sup>4</sup>, the spatial strategy guiding principles and responses from the consultations undertaken, all sites within the urban area/PDL that were assessed as suitable, available and deliverable for residential development were allocated in the draft plan. A strategic case of exceptional circumstances justifying the adjustment of Green Belt boundaries were established. The quantum of land allocated in the Green Belt was that required in order to meet housing requirements once allocations within the urban area and PDL were optimised; this approach will need to continue in the revised draft plan, given the need to optimise use of brownfield land.
- 3.3 The vast majority of Green Belt sites that were promoted prior to the publication of the draft Regulation 18 plan in 2021 and were consistent with achieving a sustainable pattern of development – i.e. were located in or adjoining existing settlements or where a sustainable new settlement could be delivered - had to be included, due to the decision to meet local housing need in full, and the lack of brownfield capacity.
- 3.4 The process through which sites were selected can be summarised as follows:

Identifying sites

Include all sites identified over size threshold (capable of accommodating 10 units+) from all sources

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<sup>3</sup> NPPF para 141 in particular

<sup>4</sup> e.g. [Calverton Parish Council v Nottingham City Council & Ors \[2015\] EWHC 1078 \(Admin\) \(21 April 2015\) \(bailii.org\)](#)

Achieving a sustainable pattern of development	Only consider sites that contribute to the achievement of sustainable development – those not falling into one of the five location categories or where there are absolute constraints fall away.
Prioritising Green Belt protection	Priority to be given to sites within the urban area, then PDL in the Green Belt, then, as far as possible, to lower performing land in the Green Belt
Planning assessment	Consider policy and technical constraints, including <ul style="list-style-type: none"> <li>• sustainability of location;</li> <li>• existing or potential availability of appropriate infrastructure;</li> <li>• Green Belt impact;</li> <li>• impact on local character, landscape and environment;</li> <li>• transport and highways issues;</li> <li>• flooding;</li> <li>• viability;</li> <li>• SA/SEA (ongoing process);</li> <li>• Assess density options and optimise capacity</li> </ul>
Mitigation	Consider what mitigation may be required in order to overcome any negative impacts that may arise from allocation and development and whether this can be achieved
Deliverability	Consider whether site can deliver within the plan period
Exceptional Circumstances	For sites in the Green Belt, establish whether there are strategic and local cases for exceptional circumstances for altering Green Belt boundaries
Selection	Bring evidence together. Compare sites. Select allocations.

#### 4. Site re-consideration

##### 4.1 In the context of:

- Concerns raised through the Regulation 18 consultation about the quantum and location of sites allocated, the particular importance of the Green Belt and the consequent need to consider revised development targets; and
- The potential availability of some alternative sites – both Green Belt and non-Green Belt - not previously included in the draft plan.

4.2 It was clear that the package of sites allocated in the revised plan would need to vary to some degree from that in the set-aside Regulation 18 plan – both in terms of the actual sites identified and in the case of some sites, the number of homes that they would be expected to deliver. Consequently the appropriateness of including in the plan sites assessed (through the 2023/4 Housing and Economic Land Availability Assessment (HELAA)) as being suitable, available and deliverable for housing, and/or their capacity, has been re-considered:

- **Sites within the urban area:** their location and capacity have been identified or, if included in the set-aside plan, confirmed, through the HELAA update<sup>5</sup>. These sites are prioritised for allocation; any urban site considered to be suitable, available and achievable is included as an allocation in the revised Local Plan.
- **Green Belt sites :** sites have been re-assessed (or if newly submitted, assessed) and compared, in terms of their Green Belt performance and a number of other environmental and sustainability criteria, in order to inform the selection of those which will deliver a (revised) housing target once use of urban/PDL land is optimised

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<sup>5</sup> This includes any safeguarded sites as they are outside the Green Belt



- 4.3 This site assessment and comparison exercise focusses on sites in the Green Belt. A limited number of Green Belt sites which would clearly and demonstrably not be acceptable as site allocations have been excluded from this process; see paragraph 6.3 below.
- 4.4 As indicated in paragraph 4.1 above, all non-Green Belt sites (above the HELAA threshold of 10 units) assessed as suitable, available and achievable for residential use will be included as an allocation and are therefore not part of the site comparison exercise. Sites promoted for or potentially suitable for housing within urban areas but which are designated for other, non-residential land uses have been assessed through the HELAA.
- 4.5 With regard to optimising site capacity, the updated HELAA considers a scenario with a further density uplift that had a baseline of 40dph (with further uplifts dependent on a number of other variables).

## 5. Non Green Belt sites – capacity

- 5.1. The updated HELAA demonstrates that a total around 3,650 homes could be delivered in non-Green Belt sites and locations, with a baseline density (plus multipliers) of 30dph and 5,400 homes with a baseline density (plus multipliers) of 40dph. The establishment of a revised Local Plan target identifies the balance that needs to be delivered within areas currently in the Green Belt.

## 6. Green Belt site comparison

### Source of sites assessed

- 6.1 The following categories of Green Belt sites included in the 2023/4 HELAA and promoted for residential use have been assessed and compared in order to aid the process of site selection for the revised draft plan:
- Sites included in the set aside draft Regulation 18 Plan
  - Sites promoted prior to publication of, but not included in, the draft Regulation 18 plan in 2021 as documented in the [Potential sites for Housing and Employment consultation report](#). This includes sites promoted prior to and arising from the 2018 Potential Sites for Housing and Employment consultation
  - Sites promoted since publication of the draft Regulation 18 Plan, including through responses to the Regulation 18 consultation, the 2022 Call for Sites and any other sources (e.g. identified by officers)
- 6.2 Despite the fact that they fall into different categories in terms of how and when they have come forward, all Green Belt sites have as far as possible been compared in the same way as long as they:
- Fall into one of the 5 location categories identified in the spatial strategy,
  - Meet the HELAA threshold (10 residential units);
  - Are considered (through the updated HELAA) to be available, suitable and deliverable; and
  - There are no other absolute constraints<sup>6</sup>.

### Categories of Sites not assessed

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<sup>6</sup> Examples include those sites with an SSSI or Local Wildlife Site designation across whole site

- 6.3 A number of Green Belt promoted sites would clearly and demonstrably not be acceptable as site allocations and these have not been assessed and compared at this stage. A pre-requisite for consideration remains that any site should be consistent with the Local Plan spatial strategy referenced in paragraph 2.3. As noted in paragraph 2.6, this overall approach remains valid, albeit that the borough wide quantum and the relative amounts of development within each location category have the potential to differ from the earlier draft plan. Sites which do not fit this overall approach – for example due to being geographically remote / distant from existing Settlement Hierarchy settlements and services and / or too small to be able to secure the infrastructure required to support development in more remote locations have not been considered further. Nevertheless, sites promoted have been assessed in the updated HELAA.
- 6.4 It follows from paragraph 6.2 above that sites falling into the following additional categories have not been considered at this stage for inclusion as a site allocation within a revised draft Local Plan:
- Sites not assessed in the 2023/4 HELAA update, including those with a capacity below the HELAA threshold of 10 units;
  - Sites which although assessed in the HELAA for housing use were considered not to be suitable, available or achievable;
  - Sites having ‘absolute’ constraints.<sup>7</sup>
- 6.5 Green Belt sites not included in the site comparison exercise, and the reasons for excluding them from the site comparison exercise, are listed at Appendix 4. As indicated in paragraph 4.3 above, this exercise focusses on assessing and comparing Green Belt sites; sites in the urban area are not therefore included as it is intended that all those above the HELAA size threshold considered genuinely suitable, available and achievable, subject to any other planning designations on those sites, would be allocated.
- 6.6 A limited number of small sites within the smallest villages in the borough (Tiers 6 and 7) have not been assessed through this exercise although they are included in the updated HELAA. These are listed in Appendix 5. These villages are wholly contained within the Green Belt (i.e. ‘washed over’) and a separate assessment of sites promoted in those locations has previously been undertaken<sup>8</sup>; this will continue to guide the location of any future allocations within these settlements.

### Scoring the sites

- 6.7 Sites have been assessed in relation to a number of key criteria. Recognising that responses to the draft Local Plan have emphasised the importance of the Green Belt, the site comparison exercise first compares sites in terms of how they meet the national purposes of the Green Belt and protect the wider strategic Green Belt. However, the exercise also considers a number of other key environmental constraints. This has enabled sites to be categorised in terms of their suitability for allocation, in terms both of Green Belt harm and overall / other harm.
- 6.8 The assessment criteria employed are as follows:
- Wider sub-area strategic Green Belt performance
  - sub-area performance against NPPF Green Belt objectives
  - Recommended for further consideration for allocation in the Local Plan in Green Belt review
  - Accessibility to local services

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<sup>7</sup>

<sup>8</sup> <https://www.hertsmere.gov.uk/Documents/09-Planning--Building-Control/Planning-Policy/Local-Plan/Washed-over-villages-study-Final-Report-Rev-A-Issue-270820-PDF-21.42Mb.pdf>

- Substantive transport issues
- Flood risk issues
- Statutory body - substantive other technical concerns / objections
- Sustainability Appraisal assessment

6.9 In order to compare and score all sites on a consistent basis, some additional work has been necessary:

- A limited number of sites in the updated HELAA and/or now being assessed and compared were not subject to an initial Stage 2 Green Belt Assessment<sup>9</sup>. However, these sites have been independently assessed by consultants Arup on the same basis as the original Stage 2 Green Belt assessments<sup>10</sup>. These sites are listed in Appendix 6.
- Sites which have been promoted to the Council more recently have not previously been subject to any consultation with infrastructure providers. A targeted engagement exercise for these sites has been undertaken seeking infrastructure consultee comments. These sites are listed in Appendix 7
- Sites which have been promoted to the Council more recently had not previously been subject to Sustainability Appraisal. An SA/SEA update of these sites in the same way as those assessed under previous iterations of the sustainability appraisal process has been undertaken. These sites are listed in Appendix 8.

6.10 In assessing and comparing sites it is acknowledged that there remains a degree of subjectivity, particularly when applying a numeric score to what may be a qualitative judgement around, for example, Green Belt performance.

6.11 A scoring system has therefore been devised which, as far as possible, maximises objectivity and consistency when comparing sites according to the assessment criteria. Table 1 below sets out the criteria against which each site is assessed, the source of relevant supporting technical evidence, how performance in relation to each criterion has been scored, and whether any specific weighting has been applied in relation to each criterion. Each site has been scored between 1 and 5 against the various criteria, with a 1 indicating that a site performs worst, and a 5 that it performs best against that criterion. The weighting reflects the importance of each individual criterion, as indicated in the table.

6.12 It should be emphasised that the scoring of sites is one of a number of considerations when determining sites to be included in the Local Plan. It is not the sole determinant and a number of other factors will also guide the site selection process, as set out in paragraph 12.2.

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<sup>9</sup> [Green Belt Assessment 2 Final Report \(hertsmere.gov.uk\)](https://hertsmere.gov.uk) and [050320 HBC GB Stage 2 Additional Sites Final Report ISSUE \(hertsmere.gov.uk\)](#)

<sup>10</sup> [Green Belt Assessment Stage 2 - Additional Sub-Area Assessed \(2024\) - DRAFT REPORT](#)

**Table 1. High level housing site assessment criteria – summary**

Criteria	Source	Weighting	Scoring	Justification for weighting	
<b>Wider sub-area strategic Green Belt performance</b>	Arup Green Belt Assessment	X1.5	<i>Importance</i> Less important Part of area less important Important	The importance attached locally to the Green Belt, evident from public engagement undertaken in 2021, is reflected in an additional weighting. The extent to which different areas of Green Belt locally contribute to the wider, strategic Green Belt, forms an important element of assessment of Green Belt 'quality'.	
<b>sub-area performance against NPPF Green Belt objectives</b>	Arup Green Belt Assessment		<i>Performance</i> Weakly Moderately Strongly		
<b>Recommended for further consideration for allocation in the Local Plan</b>	Arup Green Belt Assessment		<i>Recommendation</i> Sub-area recommended Part of sub-area recommended Site not within part of sub-area recommended Sub-area not recommended		
<b>Accessibility to local services</b>	Hertsmere accessibility mapping <sup>11</sup>	X0.75	<i>Accessibility score</i> 25.000001-30	Strategic Green Belt sites have an in-built disadvantage given that they presently contain no services within them. Strategic scale sites are capable of delivering on or off-site facilities to address this and so weighting reduced to reflect current accessibility to local services.	
			20.000001 to 25		5
			15.000001 to 20		4
			10.000001 to 15		3
			0-10		2
<b>Substantive transport issues</b>	HCC responses to individual sites. Officer assessment.	X1	<i>Transport issues score</i> 1-5 based on extent of issues raised with 1 having the most substantive transport issues	Transport impacts can, individually, be mitigated to varying extents with very localised issues typically addressed at any planning application stage. No additional weighting is considered appropriate for this criterion with the cumulative impacts and mitigation of sites being assessed separately.	
<b>Flood risk</b>	Environment Agency fluvial and surface water flood maps		<i>% of site extent covered by flood risk</i> <5%	Due to the size of strategic sites, in particular, flood risk areas can generally be avoided and/or mitigated on many sites. Weighting reduced to reflect scope to avoid areas of flood of risk.	

<sup>11</sup> [Settlement Hierarchy report - FINAL \(herts.gov.uk\)](https://www.herts.gov.uk/development/planning-and-building-control/settlement-hierarchy-report)

Criteria	Source	Weighting	Scoring	Justification for weighting
		0.75	5-25% 26-40% 41-65% 66%+	4 3 2 1
<b>Infrastructure consultees - substantive other technical concerns / objections</b>	Responses from statutory national and local bodies including Environment Agency, and other organisations listed in Appendix 1 of Statement of Community Involvement	1	<i>Substantive objections</i> 1-5 based on extent of objections raised with 5 being no substantive objections and 1 being a significant number of substantive objections.	Statutory bodies have provided relatively high level observations on most sites. This given an indication of whether there are substantive technical concerns but as many of the site delivery impacts are more localised, it is not considered appropriate to weight this criterion.
<b>Sustainability appraisal assessment</b>	Hertsmere Local Plan Sustainability Appraisal	1.5	<i>Sustainability Appraisal score</i> <40 <50 50-54.5 55-59.5 60-64.5 65+  1-5 based on blended score derived from SA scoring of sites against 15 sustainability objectives, with 5 being the most positive and 1 the most negative	0 1 2 3 4 5  Sustainability Appraisal is a comprehensive assessment a wide range of sustainability objectives. As this extends across social, economic and environmental objectives, it is considered to provide a robust overall assessment of a site's sustainability credentials and this is reflected in the additional weighting.

## 7. Assessment criteria

### GREEN BELT

#### Assessing Green Belt performance – data source

- 7.1. Sites have been given Green Belt performance scores based on the independent assessment of the Green Belt undertaken by consultants Arup.
- 7.2. Arup’s Stage 1 study examines the performance of the whole borough’s Green Belt, divided into 52 parcels, assessed against 4 of the 5 NPPF Green Belt purposes:
1. To check the unrestricted sprawl of large built up areas
  2. To prevent neighbouring towns merging into one another
  3. To assist in safeguarding the countryside from encroachment
  4. To preserve the setting and special character of historic towns
- 7.3. The study sets out criteria<sup>12</sup> that it uses to assess the strength of each parcel’s performance in relation to each Green Belt purpose and scores that performance on the following scale:

Overall Strength of Green Belt Parcel against Criterion	Score	Equivalent Wording
	0	Does not meet Criterion
	1	Meets Criterion Weakly or Very Weakly
	2	Meets Criterion Relatively Weakly
	3	Meets Criterion
	4	Meets Criterion Relatively Strongly.
	5	Meets Criterion Strongly or Very Strongly

- 7.4. The overall performance of each parcel is then identified on the following basis

Parcel overall performance	Explanation	Number of parcels
Strongly performing	Meeting at least one of the purposes strongly (score 4 or 5)	35
Moderately performing	Meeting at least 1 purpose moderately (score 3) but none strongly	14
Weakly performing	Failing to meet or meeting all purposes only weakly (score 1 or 2)	2
Not performing	Does not meet any purpose	1

- 7.5. The Stage 1 assessment clearly establishes that the majority of Hertsmere’s Green Belt performs an important role in relation to the purposes set out in the NPPF, but identifies that some areas are more ‘important’ than others in terms of meeting the actual purposes of the Green Belt. The assessment identifies a number of areas worthy of further consideration, namely

<sup>12</sup> See [New-LP-GB-Assessment-Report2016 \(hertsmere.gov.uk\)](http://New-LP-GB-Assessment-Report2016(hertsmere.gov.uk))

- Parcels which do not meet any NPPF purpose or score weakly overall against all NPPF purposes
  - Medium or strongly scoring Parcels where there is clear scope for sub-division to identify more weakly performing sub-areas. (Given the size of some of the assessment parcels some parcels inevitably exhibit considerable variation in character within them, particularly those closer to existing settlements where many of the promoted sites are located.)
- 7.6. With regard to the second of these, the Stage 2 study sub-divides larger parcels into sub-areas, in order to undertake a finer grain assessment of Green Belt purposes performance and the contribution of each sub-area – and hence the sites within them - to the wider strategic Green Belt. Parcels which were previously assessed as performing weakly in their entirety were not analysed at Stage 2 as they had already been recommended for consideration (as part of the wider Local Plan process) in the Stage 1 report.
- 7.7. The Stage 2 assessment took a proportionate but thorough approach to the identification of sub-areas assessed:
- It focuses on the parts of the Green Belt where, if exceptional circumstances can be demonstrated, development would be consistent in locational terms with the spatial strategy i.e. those areas around the existing towns, larger villages and in the areas proposed for a garden village, as these are the most likely locations for significant growth.
  - It covers both HELAA sites<sup>13</sup> and in the interests of comprehensiveness, further locations around existing settlements, excluding:
    - land in the strongest performing Green Belt parcels where sites have not been specifically promoted i.e. there are no suitable/available/deliverable sites
    - sub-areas which form the whole gap between identified non-Green Belt settlements, where development could result in the physical coalescence of non-Green Belt settlements
    - areas entirely or largely constrained by major policy constraints<sup>14,15</sup>
- 7.8. In total, the original study identified 72 sub-areas, together with potential locations for a new settlement (divided into a total of 9 sub-areas) for assessment. Subsequently two additional Stage 2 pieces of work have been undertaken identifying and assessing a further 11 sub-areas – 3 in March 2020 and a further 9 in early 2024.
- 7.9. Whilst this approach has ensured that the majority of promoted sites are located within sub-areas that have been assessed at Stage 2 a few are not because they were deemed, at Stage 1, not to meet Green Belt purposes at all. For the purposes of comparing sites, however, these sites have been classified in the same way as the weakest performing sites which were assessed in the Stage 2 assessment.

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<sup>13</sup> HELAA undertaken in 2019

<sup>14</sup> Flood zone 3b, SSSIs, Ancient Woodland, Historic Parks and Gardens, Scheduled Monuments, Historic Battlefields, LNR, LWS, land held permanently in trust as POS (NT estates, Shenley Park, Bushey Manor Fields)

<sup>15</sup> Due to their scale and strategic nature, sites originally put forward as new Garden Villages are considered in their totality regardless of the presence of any major policy constraints.

- 7.10. As with the larger parcels in the Stage 1 assessment, the Stage 2 study assesses the strength of each sub-area's performance in relation to each Green Belt purpose on the basis of identified criteria<sup>16</sup> and categorises them on the scale set out in para 7.3 above.
- 7.11. In addition to assessment against the NPPF Purposes 1-4, the study undertakes a qualitative assessment to identify the roles the sub-areas play as part of the larger Green Belt parcel within which they are located and the wider Green Belt in order to establish
- how important the sub-area is to the performance of the Parcel
  - whether, and how, the potential release of a sub-area would impact on the assessment of the remaining Parcel and adjacent sub-areas or Parcel(s)
  - whether the potential release of a sub-area would harm the long-term protection or integrity of the surrounding Green Belt
- 7.12. As a result, the importance of each sub-area and whether they, or sites within them, are recommended in the Arup reports<sup>17</sup> for further consideration for allocation are categorised as follows.

<b>Meets purpose assessment criteria</b>	<b>Contribution to wider strategic Green Belt</b>	<b>Categorisation</b>	<b>No of sub-areas</b>
Strongly	Important	Not recommended for further consideration	24
Strongly	Less important	Recommended for further consideration	2
Strongly	Partly less important	Part recommended for further consideration	7
Moderately	Important	Not recommended for further consideration	15
Moderately	Less important	Recommended for further consideration	12
Moderately	Partly less important	Part recommended for further consideration	5
Weakly	Important	Not recommended for further consideration	3
Weakly	Less important	Recommended for further consideration	15

- 7.13. This approach to categorising sub-areas takes account of the fact that sub-areas can meet one or more of the Green Belt purposes strongly but overall make a lesser contribution to the purposes when compared with the wider Green Belt parcel in which they lie, and so where their removal from the Green Belt would not harm the function or integrity of the wider Green Belt. Conversely, it also reflects the possibility that sub-areas can meet the purpose assessment criteria weakly but are integral to maintaining the protection or integrity of the surrounding Green Belt; they are therefore assessed as important and not recommended for further consideration. Where part of the sub-area within which a site is located is recommended for further consideration, this recommended area may or may not include part or all of the site itself. This has been taken into account in the scoring as explained in paragraph 7.21 below.

<sup>16</sup> [Green Belt Assessment 2 Final Report \(hertsmere.gov.uk\)](https://www.hertsmere.gov.uk)

<sup>17</sup> [Green Belt Assessment 2 Final Report \(hertsmere.gov.uk\)](https://www.hertsmere.gov.uk) and [050320 HBC GB Stage 2 Additional Sites Final Report ISSUE \(hertsmere.gov.uk\)](https://www.hertsmere.gov.uk)



7.14. As of February 2024, 40 sub-areas are, so far, wholly or partly<sup>18</sup> categorised for further consideration with a total of 29 locations<sup>19</sup> recommended for further consideration in the Local Plan, on the basis that their potential removal from the Green Belt would be unlikely to harm the function or integrity of the wider Green Belt. <sup>20</sup> The conclusions relating to each sub-area also include considerations related to potential revised Green Belt boundaries were the sub-area or part of it to be removed from the Green Belt.


7.15. As referred to in paragraph 7.8, the independent stage 2 Green Belt assessment also assesses the Green Belt performance of two sites promoted for a new settlement. A total of 9 sub-areas cover the extent of the two sites - three covering Rabley Green (east of Shenley) and six covering Redwell Village (south east of London Colney), now re-named Bowmans Cross. The stage 2 assessment recommends one sub-area within each new settlement site for further consideration, although it recognises that the sub-area recommended within the Rabley Green promotion would be of insufficient scale to be suitable for a new settlement. The availability of the Rabley Green site has not been demonstrated and it is therefore excluded from the assessment.

**Assessing Green Belt Performance – scoring**

7.16 Green Belt sites have been given scores based on Arup’s conclusions in relation to the Green Belt parcel (as assessed at Stage 1) and sub-area(s) (Stage 2) within which they are located, unless those sites have already been ruled out for further assessment on other grounds as indicated in paragraph 6.3. These scores have contributed to each site’s overall assessment.

7.17 Given the very high level of importance attached to protecting the Green Belt, as evidenced by the responses to the previous version of the draft plan, several aspects of Green Belt performance have been taken into account.

7.18 Firstly, a site is scored according to the extent to which the Arup Stage 2 study finds that the sub-area within which it is located meets NPPF Green Belt purposes (see paragraph 7.10 above). A weak performance scores most highly in the Council’s assessment and comparison of sites reflecting its (relatively) less important Green Belt function and ensuring sub-area performance is taken into account in the Council’s wider assessment of sites.

Criterion	Arup assessment of Green Belt performance	HBC site matrix assessment score	Site suitability
Sub-area performance against NPPF Green Belt objectives	Strong	1	
	Moderate	3	
	Weak	5	

7.19 A second aspect to Green Belt performance is also taken into account. As referred to in paragraph 7.13 above, there are some sub-areas identified in Arup’s review as performing strongly against NPPF Green Belt purposes but which due to their less important contribution to the wider strategic Green Belt were recommended for further consideration. However, their strong


<sup>18</sup> Where variation within the sub-area results in only part being considered appropriate for further consideration

<sup>19</sup> Some locations span more than one sub-area


<sup>20</sup> These figures include the 3 additional areas assessed in 2020 but not, so far, the 8 sites / sub-areas currently being assessed (March 2024). The figures will be updated once this work concludes.

performance against NPPF Green Belt purposes affects their overall score in the Council’s wider assessment of sites

7.20 Conversely there are some sub-areas which although performing less strongly themselves are actually important to the integrity of the wider Green Belt and their removal from the Green Belt would be more damaging. Arup’s conclusions concerning the importance of both the sub-area to the parcel and the wider strategic Green Belt within which it is located are taken into account, with those areas judged to be less important to both the sub-area and wider Green Belt scoring more highly.

Criterion	Arup assessment of Green Belt importance	HBC site matrix assessment score	Site suitability
Sub-area importance to wider Green Belt performance	Important	1	
	Part of area less important	3	
	Less important	5	

7.21 A third score has been added, based on whether the Stage 2 Arup study actually recommends the sub area – and the site within it - for further consideration for allocation in the Local Plan. This is the main, independent, assessment of which areas of Hertsmere’s Green Belt would suffer least harm should sites be allocated for development. It brings together the sub-area and parcel scores with an assessment of the scope to create permanent and recognisable new boundaries should sites be removed from the Green Belt. Sites lying within an area recommended for further consideration score highly, with those not recommended being given the lowest score. Where a sub-area is partly recommended for further consideration but the site itself does not lie within the recommended part of the sub-area, the site achieves only a low score. Sites which lie partly within the recommended area score 3, and sites lying wholly within the part of the sub-area recommended for further consideration score highly (5).

Criterion	Arup recommendation	HBC site matrix assessment score	Site suitability
Recommended for further consideration for allocation in the Local Plan	Site not recommended	1	
	Part of site recommended	3	
	Site recommended	5	

7.22 In recognition of the importance of minimising harm to Hertsmere’s Green Belt, a weighting of 3 has been applied to the scores in this third category.

## ACCESSIBILITY TO LOCAL SERVICES

### Assessing Accessibility – Data source

7.23 Development should be located in areas which already have ease of access to key local services and amenities, or where this can be readily provided, to ensure that new development is genuinely sustainable. All sites have been ascribed an accessibility score based on the Settlement Hierarchy and Accessibility Mapping Analysis<sup>21</sup> which forms part of the Local Plan

<sup>21</sup> [Settlement Hierarchy report - FINAL \(hertsmere.gov.uk\)](http://hertsmere.gov.uk)

evidence base. This work underpins the spatial strategy, which prioritises development locations which are, or can be made to be, the most accessible.

7.24 The Settlement Hierarchy and Accessibility mapping analysis analyses the population, households and availability of services in each of the borough’s settlements and provides an audit of accessibility – distance and ease of travel to local services - across the borough. From this can be deduced the ability of each location to sustainably absorb relative quantities of development and within that context the selection of more sustainably located sites.

7.25 For all settlements of over 50 households, an audit of services and facilities present in each settlement considered to be important to their sustainable functioning has been undertaken. These include:

Residential Service	Community Service	Key Regional Service
Convenience Store	Primary School	Secondary School
Pub	GP Surgery	Train Station
Place of Worship	Supermarket	
Town/ Village Hall	Post office	
	Dentist	
	Pharmacy	
	Gym/ Leisure Centre	

Source: Classification of services for Settlement Hierarchy – Settlement Hierarchy Report

7.26 Settlements are scored and ranked according to the number of such services present, with higher level services being more heavily weighted to reflect their importance in terms of enhancing sustainability of location:

	Aldenharn	Borehamwood	Bushey	Eistree (village)	Letchmore Heath	Patchetts Green	Potters Bar	Radlett	Ridge	Shenley	South Mimms
Convenience Store		Y	Y	Y			Y	Y		Y	
Pub		Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Place of worship	Y	Y	Y	Y			Y	Y	Y	Y	Y
Town/Village Hall		Y		Y			Y	Y	Y		
Primary School		Y	Y	Y			Y	Y		Y	Y
GP surgery		Y	Y				Y	Y		Y	
Supermarket		Y	Y				Y				
Post office		Y	Y				Y	Y		Y	
Dentist		Y	Y	Y			Y	Y		Y	
Pharmacy		Y	Y	Y			Y	Y		Y	
Gym/Leisure		Y	Y				Y	Y			
Secondary school/ College		Y	Y				Y				
Train Station		Y	Y				Y	Y			
<b>Total Score</b>	<b>1</b>	<b>35</b>	<b>34</b>	<b>12</b>	<b>2</b>	<b>1</b>	<b>34</b>	<b>27</b>	<b>3</b>	<b>19</b>	<b>5</b>
<b>Position</b>	<b>10th</b>	<b>1st</b>	<b>2nd</b>	<b>6th</b>	<b>9th</b>	<b>10th</b>	<b>2nd</b>	<b>4th</b>	<b>8th</b>	<b>5th</b>	<b>7th</b>

Source: Services and facilities by settlement - Settlement Hierarchy Report

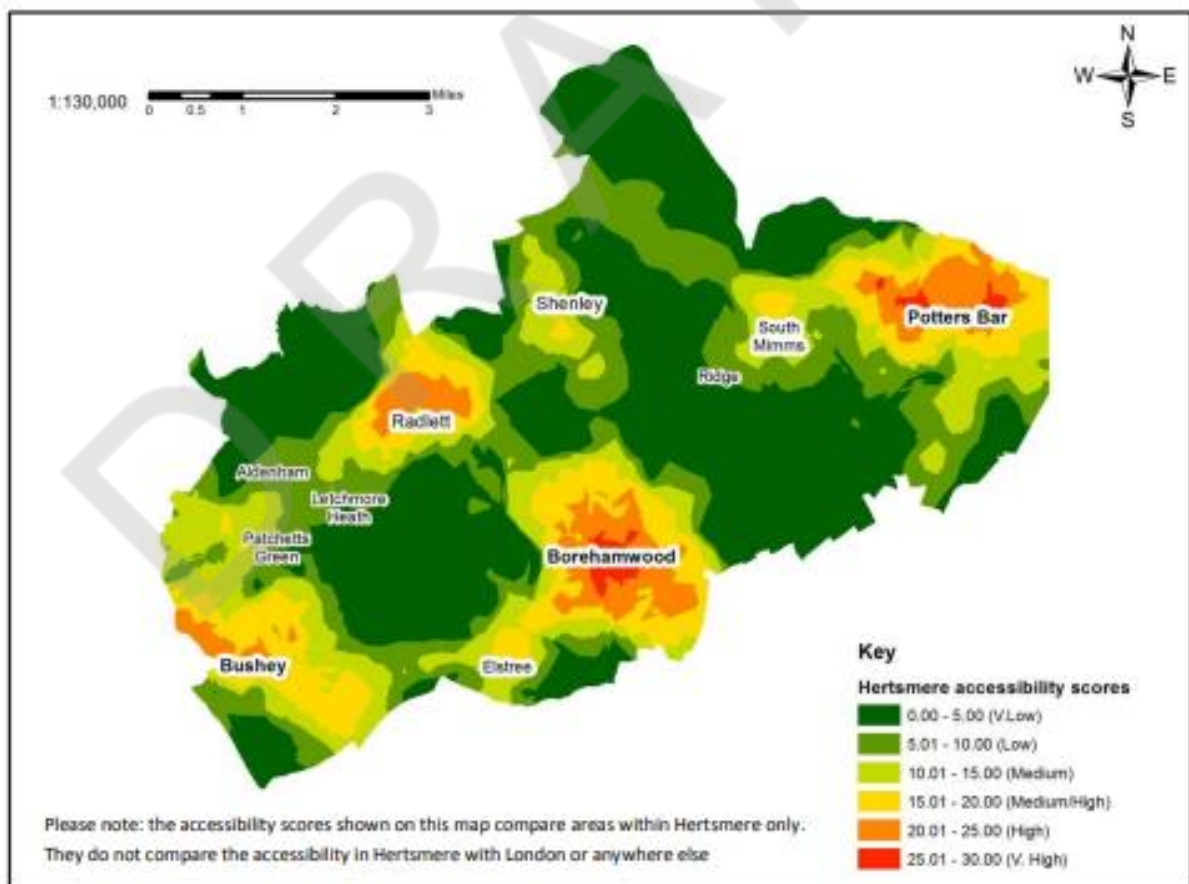
7.27 The audit of accessibility assesses the availability of public transport and ease of travel to the main settlements and key services within and adjoining the borough, based on the availability of:

Regional services	Community services
Elstree and Borehamwood station	Primary schools
Radlett station	Rural pub
Bushey station	Community centres
Watford High Street station	Local shopping parades
Stanmore tube station	Town centres (if other community services listed above were located within the town centre they were not counted separately)
Potters Bar Station	
Frequent bus service	
Infrequent bus service (only counted if there is no frequent bus service)	
Secondary schools	

Source: Audit of accessibility services - Settlement Hierarchy Report

7.28 The contribution of regional services to accessibility is scored according to whether they are within walking distance or could be accessed by bus from a designated point. Community services scores are based on walking distance alone and whether they are within 400m, 800m or 1500m. Weightings to reflect the importance of each service to overall accessibility are also applied with, for example, town centres and railway stations within walking distance being weighted the highest.

7.29 The results have then been combined and mapped to produce a composite accessibility scoring and map for the borough. Each 5 point band of scores has then been ascribed a category ranging from very low to very high accessibility. The final mapping is shown below.



7.30 Putting these factors together has informed the identification of the following Settlement Hierarchy:

Key Settlements	<b><u>Tier I Settlement – Borehamwood &amp; Elstree</u></b> <i>Population: 36,500</i> A diverse, growing population and an important economic centre for South West Hertfordshire, rail and bus links to London and other key towns, an international reputation for film and television production, along with a retail centre with a growing presence of national multiples.	
	<b><u>Tier II Settlement – Potters Bar</u></b> <i>Population: 22,900</i> A key local town in the east of the Borough with a number of major employers, two distinct shopping areas, thriving industrial areas and rail and bus links to London and towns to the north.	<b><u>Tier II Settlement – Bushey</u></b> <i>Population: 27,500</i> Predominantly residential in character covering three distinct centres (Bushey Heath, Bushey Village and North Bushey) with bus and nearby rail links to Watford and London, significant pockets of local employment and a wide variety of shops and services.
	<b><u>Tier III Settlement – Radlett</u></b> <i>Population: 8,300</i> Largely residential in character with good rail links to London and a popular well established district centre serving both the local population and an increasing number of visitors from further afield, with a large number of shops and local services.	
Key villages	<b><u>Tier IV Settlement – Shenley</u></b> <i>Population: 4,000</i> A rural village with a distinctive centre that has grown substantially in the last 20 years with the development of the former Shenley Hospital. Largely residential in character with a limited range of local shops and local services, and limited opportunity for infill development.	<b><u>Tier IV Settlement – Elstree (Village)</u></b> <i>Population: 1,700</i> A distinctive village in its own right, with a small visible centre that contains a range of local businesses and local services with limited opportunities for infill development.
	<b><u>Tier V Settlement – South Mimms</u></b> <i>Population: 900</i> A distinctive village in its own right that is located close to the junction with the M25, with a limited range of facilities including a primary school.	
	<b><u>Tier VI Settlement - Aldenham including (Wall Hall) , Letchmore Heath, Patchetts Green, Ridge</u></b> Small rural villages which remain largely residential in character and land use, relying on larger settlements nearby for employment and local services.	
Other villages	<b><u>Tier VII Settlements - Small hamlets with less than 50 households including Round Bush, Bentley Heath, High Cross.</u></b>	


- 7.31 This work – the Settlement Hierarchy and accessibility analysis and mapping which feeds into it - illustrates the relative sustainability of each settlement and, unsurprisingly, how (unless a location can be made more sustainable through significant investment in infrastructure) this decreases with distance from these settlements. It has informed both the overall spatial strategy and the selection of sites in the set-aside draft plan. It remains valid in re-assessing and comparing sites in order to inform site selection in the revised draft plan.
- 7.32 It should be pointed out at this stage that although the tier 6 and 7 settlements are generally too small to support their own services and are largely dependent on nearby higher level settlements, enabling very limited amounts of residential development will provide opportunities for small numbers of newly formed households to remain in the area. This is considered to be important in terms of providing opportunities for maintaining balanced communities and the future viability and affordability of these communities. The mapping indicates that even these villages have a degree of accessibility higher than the more remote areas of Green Belt beyond. For these reasons, the



overall strategy envisages limited residential development, appropriate to its surroundings in quantum and design terms, being acceptable in these villages

### Assessing Accessibility - Scoring

7.33 All sites now being assessed for their Green Belt importance have been given a score based on their accessibility; this score has contributed to their overall assessment. Sites have been given an accessibility score of 1-5 based on the above accessibility mapping as follows:

Original mapping score	Accessibility mapping zone category	HBC site matrix assessment score	Site suitability
0 - 5	Very low	1	
5.01 - 10	Low	1	
10.01 - 15	Medium	2	
15.01 - 20	Medium high	3	
20.01 - 25	High	4	
25.01 - 30	Very high	5	

7.34 Where sites lie within more than one accessibility zone:

- If an illustrative layout has been provided this has been used to guide scoring – the score for the accessibility zone within which most of the development is proposed will be used
- If no illustrative layout has been provided a judgement will be made about where most of the development is likely to be located: usually this will be closer to the anticipated access points unless there are constraints preventing this.
- For sites adjoining existing urban areas / settlement boundaries, it will be assumed that the majority of development will adjoin the existing developed area and the score for the accessibility zone closest to that of the adjoining developed area will be applied.

7.35 A weighting of 0.75 has been applied to the accessibility scoring arising from the Accessibility Mapping Analysis when arriving at a composite score for each site. Whilst accessibility is an important aspect of a site’s sustainability credentials, strategic Green Belt sites have an in-built disadvantage given that they presently contain no services within them. Strategic scale sites are capable of delivering on or off-site facilities to address this. In addition sites have also been scored against Sustainability Appraisal Objectives, which include Objective 2 ‘*Services To ensure ready access to essential services and facilities for all residents*’ A weighting of 0.75 has therefore been applied given the scope for larger, strategic sites to improve their accessibility.

## FLOOD RISK

### Assessing Flood Risk – Data source

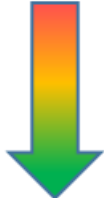
7.36 Paragraph 159 of the NPPF indicates that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, and paragraph 161 that “all plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk...” . In order to assess each site consistently and thoroughly sites have been assessed against the latest Environment Agency flood risk maps. <sup>22</sup>

<sup>22</sup> [Flood map for planning - GOV.UK \(flood-map-for-planning.service.gov.uk\)](https://www.gov.uk/guidance/flood-map-for-planning)

- 7.37 It is recognised that the sequential test also requires other types of flood risk to be assessed including the residual flood arising from reservoir failure; these wider issues are being addressed through the SFRA work where they are being given appropriate weighting, consistent with the approach advocated in industry guidance<sup>23</sup>. This includes the undertaking of a two stage assessment which firstly screens a long list of 155 sites for percentage coverage from different flooding sources; the more flood prone sites are then assessed in further detail. Only sites that could not accommodate 10 or more homes, or are located in isolated locations in the countryside have been excluded from the 'long list' of sites covered by the initial screening.
- 7.38 Fluvial and surface water flood risks however present the greatest flood risks, in terms of frequency and impact, whereas there has been, for example, no loss of life from reservoir flooding in the UK since 1925. The overall assessment and comparison of sites has therefore only considered fluvial and surface water flood risk, notwithstanding that the SFRA considers a broader range of flood risk sources.

### Assessing Flood Risk – scoring

- 7.39 The extent (if any) to which each site now being reviewed falls within an area at risk of fluvial or surface water flooding has been assessed. An assessment of the proportion of each site at risk of flooding from any source has been made and a score attributed as follows:

Approximate % of site extent covered by fluvial or surface water flooding	HBC site matrix assessment score	Site suitability
66%+	1	
41-65%	2	
26-40%	3	
5-25%	4	
Less than 5%	5	

- 7.40 Due to the size of strategic sites in particular, flood risk areas can generally be avoided and/or mitigated so a weighting of 0.75 has been applied to the scoring arising from the flood risk analysis when arriving at a composite score for each site.

### Substantive transport issues

#### Assessing Transport Issues – information source

- 7.41 Sites included in the set-aside draft plan or not included in the set-aside draft plan but included in the previous Potential Sites for Housing and Employment consultation have been assessed on the basis of
- whether HCC as highway authority or National Highways have raised any substantive issues and/or
  - whether officers are aware e.g. through subsequent scheme development, that significant highways issues remain to be resolved.

<sup>23</sup> Strategic flood risk assessments A GOOD PRACTICE GUIDE

[https://www.adeptnet.org.uk/system/files/documents/FRS18204%20SFRA%20Good%20Practice%20Guide\\_Final\\_Nov2021.pdf](https://www.adeptnet.org.uk/system/files/documents/FRS18204%20SFRA%20Good%20Practice%20Guide_Final_Nov2021.pdf)

- 7.42 Where sites now being considered have not, as indicated in paragraph 6.8, previously been subject to consultation with either of the above bodies, they have now been asked whether they have any comments to make.
- 7.43 Transport issues have been singled out for assessment separately to other technical issues due to their having been raised in so many responses received at regulation 18 consultation stage, reflecting the significant levels of concern felt locally. Sites have however been scored on the basis of any comments received from HCC or National Highways and / or officer based judgement rather than on residents' more general concerns and perceptions about network capacity..

#### **Assessing Transport Issues - scoring**

- 7.44 Officers have assessed each site taking into account the above. Sites have been given a score of 1-5 based on the extent of issues raised, with 1 having the most substantive transport issues, and 5 the least. Where HCC have indicated that an issue(s) remains to be fully resolved, a score of less than 5 will have been given even if their response is not a formal objection. Even where no specific comment has been made in relation to a site there will be localised access and transport issues to be resolved if a site is allocated; the majority of sites will therefore have received a score of four or less in this category.

#### **SUBSTANTIVE TECHNICAL CONCERNS FROM INFRASTRUCTURE CONSULTEES**

##### **Assessing Infrastructure Consultee Issues – information source**

- 7.45 Sites included in the set-aside draft plan or not included in the set-aside draft plan but included in the previous Potential Sites for Housing and Employment consultation have been assessed on the basis of whether other infrastructure consultees<sup>24</sup> have raised any substantive issues during the relevant consultation exercise.
- 7.46 Where sites now being assessed and compared have not, as indicated in paragraph 6.8, previously been subject to consultation with infrastructure consultees, these bodies have now been asked whether they have any comments to make in order to ensure that all sites are assessed consistently.
- 7.47 Issues have been taken into account when attributing a score where clear, site specific comments have been made, rather than more general comments applicable to all sites.

##### **Assessing Infrastructure Consultee Issues - scoring**

- 7.48 Officers have assessed each site taking into account the above. Sites have been given a score of 1-5 based on the extent of issues raised, with 1 being subject to the most substantive concerns, and 5 the least.

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<sup>24</sup> including Historic England, Environment Agency, other central government departments and agencies, Thames Water, TfL, National Grid and Sport England as listed within the Statement of Community Involvement (2021)



## OVERALL SUSTAINABILITY APPRAISAL

### Assessing Overall Sustainability – *Sustainability Appraisal of the Hertsmere Draft Local Plan*

7.49 The independently undertaken Sustainability Appraisal process assesses the likely social, environmental and economic effects of the policies and proposals within a plan. The SA for Hertsmere<sup>25</sup> sets out the framework for assessing sites against 15 sustainability objectives:

SA Objective ref	SA Objective
Objective 1 Education	To improve access to education, training, opportunities for lifelong learning and employability
Objective 2 Services	To ensure ready access to essential services and facilities for all residents
Objective 3 Housing provision	To ensure the provision of housing, including affordable housing and a mix that meets local needs
Objective 4 Community cohesion	To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces
Objective 5 Health	To improve population's health and reduce inequalities
Objective 6 Soil and Minerals	To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.
Objective 7 Historic Environment	To protect, and where appropriate, enhance heritage assets and their settings
Objective 8 Landscape	To maintain and enhance the quality of countryside and landscape.
Objective 9 Greenhouse gas emissions	To reduce greenhouse gas emissions, including a reduced dependence on the private car.
Objective 10 Biodiversity and Geodiversity	To protect and enhance biodiversity and geodiversity.
Objective 11 Water Quality and Quantity	To improve water quality and manage water sources sustainability
Objective 12 Flooding	To minimise the risk of flooding taking account of climate change.
Objective 13 Air Quality	To improve local air quality
Objective 14 Energy Efficiency	To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.
Objective 15 Economy	Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.

7.50 The SA scores each site according to its likely sustainability effects in relation to each objective as follows:

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<sup>25</sup> [Draft Local Plan Sustainability Appraisal Report \(PDF 4.78Mb\) \(hertsmere.gov.uk\)](#)

++	The option is likely to have a significant positive effect on the SA objective(s).
++/-	The option is likely to have a mixture of significant positive and minor negative effects on the SA objective(s).
+	The option is likely to have a minor positive effect on the SA objective(s).
0	The option is likely to have a negligible or no effect on the SA objective(s).
-	The option is likely to have a minor negative effect on the SA objective(s).
-/+	The option is likely to have a mixture of significant negative and minor positive effects on the SA objective(s).
--	The option is likely to have a significant negative effect on the SA objective(s).
?	It is uncertain what effect the option will have on the SA objective(s).
+/- or +/-	The option is likely to have an equal mixture of both minor or both significant positive and negative effects on the SA objective(s).

7.51 The SA notes that its appraisal process inevitably relies on an element of subjective judgement. However, in order to ensure consistency in the appraisal of the site options, it has developed and applied a detailed set of assumptions when appraising the sustainability effects of each. These are set out in the Sustainability Appraisal Report<sup>26</sup>.

#### Assessing Overall Sustainability – scoring

7.52 The independent Sustainability Appraisal of each site has been converted to an overall sustainability score in 3 steps:

- i. Attribute the following numeric scores to the SA assessment of the sustainability effects of the site against each sustainability objective:


<b>Sustainability appraisal of site's effects (for each objective)</b>	<b>Score attributed (for each objective)</b>
--	--

<sup>26</sup> See appendix E to the report [Draft Local Plan Sustainability Appraisal Report \(PDF 4.78Mb\)](https://www.hertsmere.gov.uk) ([hertsmere.gov.uk](https://www.hertsmere.gov.uk))

++	7
++/-	6
+	5
+/-	4
0	4
-	3
--/+	2
--	1

For each negative with a ? add 0.5 to the total score
For each positive with a ? subtract 0.5 from the total score

- ii. Aggregate the scores for the site
- iii. Convert the aggregate score for the site to a 1-5 scale on the following basis with the highest scoring sites (equating to those with the most positive sustainability effects) scoring highest in the Council’s wider assessment and comparison of sites:

Aggregate score	HBC site matrix assessment score	Site suitability
<40	0	
<50	1	
50-54.5	2	
55-59.5	3	
60-64.5	4	
65+	5	

7.53 In recognition of the importance of prioritising sustainably located and performing sites the sustainability assessment score is given a weighting of 1.5 in the Council’s wider assessment and comparison of sites.

## **Employment Sites**

### **8. Background and overall approach**

- 8.1 The site allocations in the 2021 Regulation 18 Local Plan were based on delivering the full employment need as identified through South West Hertfordshire Economic Study (2019). The study identified a need of 35,700m<sup>2</sup> of office floorspace and 81,900m<sup>2</sup> of distribution and industrial floorspace. The current industrial and distribution floorspace is considered to be meeting need based on the commitments and completions data since the 2019 study. This includes outline applications as well as current safeguarded employment land. Whilst the supply of office floorspace is currently not meeting the need identified within the study, based on the assessment of current vacancy rates of office space as well as the changing need for office floorspace due to altered work patterns since COVID-19, the allocation of office space was not considered needed as part of this assessment.
- 8.2 At the time of writing, the Council is awaiting an updated South-West Herts Economic Study that will estimate our required employment land for the plan period. Should the updated study point to a need for additional land to be considered for allocation, this will need to be addressed in the Regulation 19 version of the Local Plan.
- 8.3 However, in the context of concerns raised through the Regulation 18 consultation about the quantum and location of sites allocated, it was clear that the package of employment sites allocated in the revised plan would need to be reviewed. Consequently the appropriateness of including in the plan each site assessed (through the HELAA) as being suitable, available and deliverable, and/or their capacity, has been re-considered:
- **sites within the urban area:** their location and capacity have been identified or, if included in the set-aside plan, confirmed, through the HELAA update. These sites are prioritised for allocation; any urban site considered to be suitable, available and achievable are included as an allocation in the revised Local Plan.
  - **Green Belt sites :** sites have been re-assessed (or if newly submitted, assessed) and compared, in terms of their Green Belt performance and a number of other environmental and sustainability criteria, in order to inform the selection of those which will deliver employment land once use of urban/PDL land is optimised
- 8.4 A limited number of Green Belt sites which would clearly and demonstrably not be acceptable as site allocations, for example, due to their isolated location, have been excluded from this assessment and comparison process; see paragraphs 10.3 and 10.4 below.

### **9. Non Green Belt sites – capacity**

- 9.1 The updated HELAA demonstrates that a total of 3.99ha of industrial and warehouse employment space could be delivered in non-Green Belt sites and locations and 0.19ha of office employment space could be delivered in non-Green Belt sites and locations.

### **10. Green Belt site comparison**

#### **Categories of sites assessed**

- 10.1 The following categories of Green Belt sites promoted for employment use have been assessed:

- Sites included in the R18 Plan;
- Sites promoted prior to publication of, but not included in, the R18 plan. These are documented in the [Potential sites for Housing and Employment consultation report](#) and include sites promoted prior to and arising from the 2018 Potential Sites for Housing and Employment consultation;
- An employment land Call for Sites in 2021; and
- Sites promoted since publication of the R18 Plan, including through responses to the R18 consultation, the 2022 Call for Sites and any other sources (e.g. identified by officers)

10.2 Despite the fact that they fall into different categories in terms of how and when they have come forward, all Green Belt sites have as far as possible been compared in the same way as long as they:

- fall into one of the 5 location categories identified in the overall spatial strategy;
- are considered (through the updated HELAA) to be available, suitable and deliverable; and
- there are no other absolute constraints<sup>27</sup>.

Green Belt sites assessed and compared in this exercise are listed in Appendix 3.

### **Categories of Sites not assessed**

10.3 A number of Green Belt promoted sites would clearly and demonstrably not be acceptable as site allocations and these have not been assessed and compared at this stage. A pre-requisite for consideration remains that any site should be consistent with the Local Plan spatial strategy referenced earlier in this report. This overall approach remains valid, albeit that the boroughwide quantum and the relative amounts of development within each location category have the potential to differ from the earlier draft plan. Sites which do not fit this overall approach, for example due to being geographically remote, have not been considered further, although sites promoted have typically been assessed separately in the updated HELAA.

10.4 Sites falling into the following additional categories have also not been considered at this stage for inclusion as a site allocation within a revised draft Local Plan:

- Sites not assessed in the 2023/4 HELAA update;
- Sites which although assessed in the HELAA were considered not to be suitable, available or achievable; and
- Sites having 'absolute' constraints.<sup>28</sup>

Green Belt sites not included in the site comparison exercise, and the reasons for excluding them from the site comparison exercise, are listed at Appendix 4

10.5 As indicated in paragraph 4.3 above, this exercise focusses on assessing and comparing Green Belt sites; sites in the urban area are not therefore included as it is intended that all those that are considered genuinely suitable, available and achievable, subject to any other planning designations on those sites, would be allocated.

### **Scoring the sites**

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<sup>27</sup> Examples include those sites with an SSSI or Local Wildlife Site designation across whole site

10.6 Despite the fact that they fall into different categories in terms of how and when they have come forward, all Green Belt sites have as far as possible been compared in the same way as long as

- They fall into one of the 5 location categories identified in the spatial strategy,
- Are considered to be available, suitable and deliverable.

10.7 Sites have been assessed in relation to a number of key criteria, some of which are different to those used for the assessment and comparison of housing sites. Recognising that responses to the draft Local Plan have emphasised the importance of the Green Belt, however, the site comparison exercise first compares sites in terms of how they meet the national purposes of the Green Belt and protect the wider strategic Green Belt. However, the exercise also considers a number of other key environmental constraints. This has enabled sites to be categorised in terms of their suitability for allocation, in terms both of Green Belt harm and overall / other harm.

10.8 The assessment criteria employed are as follows:

- Wider sub-area strategic Green Belt performance
- sub-area performance against NPPF Green Belt objectives
- Recommended for further consideration for allocation in the Local Plan in Green Belt review
- Accessibility to public transport
- Substantive transport issues
- Flood risk issues
- Statutory body - substantive other technical concerns / objections
- Sustainability Appraisal assessment
- Landscape sensitivity
- Compatibility of neighbouring uses

10.9 In order to compare and score all sites on a consistent basis, some additional work has been necessary:

- A limited number of both housing and employment sites in the updated HELAA and/or now being assessed and compared were not subject to an initial Stage 2 Green Belt Assessment. However, these sites have subsequently been independently assessed by consultants Arup on the same basis as the original Stage 2 Green Belt assessment. These sites are listed in Appendix 6.
- Sites which have been promoted to the Council more recently have not previously been subject to any consultation with statutory bodies. A targeted engagement exercise for these sites has been undertaken seeking infrastructure consultee comments. These sites are listed in Appendix 7
- Sites which have been promoted to the Council more recently had not previously been subject to Sustainability Appraisal. An SA/SEA update of these sites in the same way as those assessed under previous iterations of the sustainability appraisal process has been undertaken. These sites are listed in Appendix 8.

10.10 As with housing sites, in assessing and comparing land it is acknowledged that there remains a degree of subjectivity, particularly when applying a numeric score to what may be a qualitative judgement around, for example, Green Belt performance.

10.11 A scoring system has therefore been devised which, as far as possible, maximises objectivity and consistency when comparing sites according to the assessment criteria. Table 2 below sets out the

criteria against which each site is assessed, the source of relevant supporting technical evidence, how performance in relation to each criterion has been scored, and whether any specific weighting has been applied in relation to each criterion. Each site has been scored between 1 and 5 against the various criteria, with a 1 indicating that a site performs worst, and a 5 that it performs best against that criterion. The weighting reflects the importance of each individual criterion, as indicated in the table.

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Table 2 High level employment site assessment criteria – summary

Criteria	Source	Weighting	Scoring	Justification for weighting	
<b>Wider sub-area strategic Green Belt performance</b>	Arup Green Belt Assessment	X2	<i>Importance</i>	The importance attached locally to the Green Belt, evident from public engagement undertaken in 2021, is reflected in an additional weighting. The extent to which different areas of Green Belt locally contribute to the wider, strategic Green Belt, forms an important element of assessment of Green Belt 'quality'.	
			Less important		5
			Part of area less important		3
<b>sub-area performance against NPPF Green Belt objectives</b>	Arup Green Belt Assessment	X2	<i>Performance</i>	The importance attached locally to the Green Belt, evident from the public engagement undertaken in 2021, is reflected in an additional weighting. The extent to which land meets the different purposes of the Green Belt, as set out in the NPPF, forms an important element of assessment of Green Belt 'quality'.	
			Weakly		5
			Moderately		3
<b>Recommended for further consideration for allocation in the Local Plan</b>	Arup Green Belt Assessment	X4	<i>Recommendation</i>	Ultimately, this is the key overall recommendation from Arup bringing together the sub-area scores, as well as the scope to create permanent and recognisable, revised Green Belt boundaries were a site to be removed from the Green Belt.	
			Sub-area recommended		5
			Part of sub-area recommended		3
			Site not within part of sub-area recommended		1
<b>Public Transport Accessibility</b>	Public Transport mapping	X0.75	<i>Distance to Bus Stop</i>	Strategic Green Belt sites have an in-built disadvantage given that they presently are not well located in terms of access to public transport for employees and visitors. Strategic scale sites are capable of delivering on or off-site facilities to address this and so weighting reduced to reflect current accessibility to public transport. The bus service must have a bi-hourly minimum frequency at peak times in order to be considered acceptable.	
			0m – 400m		5
			401m – 800m		4
			801m – 1500m		3
			1501m – 2500m		2
2501m+	1				
<b>Substantive transport issues</b>	HCC responses to individual sites. Officer assessment.	X1	<i>Transport issues score</i> 1-5 based on extent of issues raised with 1 having the most substantive transport issues	Transport impacts can, individually, be mitigated to varying extents with very localised issues typically addressed at any planning application stage. No additional weighting is considered appropriate for this criterion with the cumulative impacts and mitigation of sites being assessed separately.	



Criteria	Source	Weighting	Scoring	Justification for weighting					
<b>Flood risk</b>	Environment Agency fluvial and surface water flood maps	0.75	<i>% of site extent covered by flood risk</i>	Due to the size of strategic sites, in particular, flood risk areas can generally be avoided and/or mitigated on many sites. Weighting reduced to reflect scope to avoid areas of flood of risk.					
			<5%		5				
			5-25%		4				
			26-40%		3				
			41-65%		2				
<b>Infrastructure consultees - substantive other technical concerns / objections</b>	Responses from statutory national and local bodies including Environment Agency, and other organisations listed in Appendix 1 of Statement of Community Involvement	1	<i>Substantive objections</i>	Statutory bodies have provided relatively high level observations on most sites. This given an indication of whether there are substantive technical concerns but as many of the site delivery impacts are more localised, it is not considered appropriate to weight this criterion.					
			1-5 based on extent of objections raised with 5 being no substantive objections and 1 being a significant number of substantive objections.						
			<b>Sustainability appraisal assessment</b>		Hertsmere Local Plan Sustainability Appraisal	1.5	<i>Sustainability Appraisal score</i>	Sustainability Appraisal is a comprehensive assessment a wide range of sustainability objectives. As this extends across social, economic and environmental objectives, it is considered to provide a robust overall assessment of a site's sustainability credentials and this is reflected in the additional weighting.	
							<40		0
							<50		1
50-54.5	2								
55-59.5	3								
60-64.5	4								
65+	5								
<b>Landscape Sensitivity</b>	Outline Landscape Appraisals Report <sup>29</sup>	1	1-5 based on blended score derived from SA scoring of sites against 15 sustainability objectives, with 5 being the most positive and 1 the most negative	Based on employment development typically having a greater impact upon the landscape than housing, landscape sensitivity has been applied. However, no increase or decrease in weighting is considered appropriate, given that the full landscape impact will					
			<i>Landscape Sensitivity score</i>						
			Low		5				
			Low-Moderate		4				
Moderate	3								

<sup>29</sup> [Outline Landscape Appraisals Report Oct 2020 \(hertsmere.gov.uk\)](https://www.hertsmere.gov.uk/outline-landscape-appraisals-report-oct-2020)

Criteria	Source	Weighting	Scoring	Justification for weighting	
<b>Compatibility of Neighbouring uses</b>	Environmental Health consultation and officer assessment,	1	Moderate-high	2	only be known when land uses, layouts and design are clarified at an application stage. Employment development is considered to have a potentially detrimental impact upon surrounding neighbouring land uses, particularly residential receptors. The location of employment development needs to be sensitively considered but it is not considered necessary to increase or decrease the weighting as at this stage; precise impacts are likely to be unknown without knowing end users and with some impacts, potentially, capable of mitigation at planning application stage
			High	1	
			<i>Existing neighbouring land use review</i>		

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## 11. Assessment criteria

### Green Belt

11.1 As with the housing sites, employment sites have been given Green Belt performance scores based on the independent assessment of the Green Belt undertaken by consultants Arup. The same approach has been applied in terms of the methodology and scoring used for housing sites, as set out earlier in the report. However, the weighting given to Green Belt scores has been further increased given the greater impact on openness which typically arises from commercial development, particularly B8 schemes, in the Green Belt.


### Accessibility to public transport

11.2 Notwithstanding the locational requirements for commercial development, including proximity to the strategic road network for distribution and warehousing schemes, development should have good public transport connections for employees and visitors. All sites have been ascribed an accessibility score based on their proximity to a bus stop that supports at least one bi-hourly bus service at peak times. Whilst access to train stations is highly desirable, based on only Green Belt sites being assessed in this report, most locations are unlikely to be within walking distance of a train station and so proximity to the rail network has not been assessed for employment sites.

11.3 The data used to assess proximity to bus stops was generated through an assessment of each site in relation to the local bus network. This was mapped via Google maps and saved into a table for information purposes showing the proximity of each bus stop as well as their name and number of services. The accessibility was measured from the site boundary. However, if a site has access to a bus stop less with than bi-hourly bus frequency, 1 point is removed from the overall score..

### Scoring

11.4 Sites have been given an accessibility score of 1-5 based on the above accessibility criteria as follows:

Distance to bus stop	sibility to public transport	ite matrix assessment score	Site suitability
2501m+	Low	1	
1501m -2500m	Medium	2	
801m - 1500m	Medium high	3	
401m - 800m	High	4	
0m – 400m	Very high	5	

11.5 A weighting of 0.75 has been applied to the accessibility scoring. Whilst accessibility is an important aspect of a site's sustainability credentials, strategic Green Belt sites have an in-built disadvantage given that they presently contain little or no demand for public transport within them. However, strategic scale sites are capable of delivering on or off-site facilities to address this. In addition sites have also been scored against Sustainability Appraisal Objectives, which include Objective 2 '*Services To ensure ready access to essential services and facilities for all residents*'.

### Flood risk

11.6 The same methodology, scoring and weighting used for housing sites for fluvial/surface water/reservoir flood risk, as set out earlier in the report, has been applied for employment sites.

**Substantive technical concerns from infrastructure consultees**

11.7 The same methodology, scoring and weighting used for housing sites, as set out earlier in the report, has been applied for employment sites in respect of substantive technical concerns raised by infrastructure bodies.

**Sustainability Appraisal**


11.8 The same methodology, scoring and weighting used for housing sites, as set out earlier in the report, has been applied for employment sites in respect of the sustainability appraisal assessment undertaken by the Council’s independent consultants, LUC.

**Landscape sensitivity**

11.9 Due to the scale of employment development, its impact on the landscape (in addition to the Green Belt, as a separate planning designation) is considered to be of particular importance. The assessment has been based on the independent Outline Landscape Appraisals Report 2020<sup>30</sup>. However, no increase or decrease in weighting is considered appropriate, given that the full landscape impact will only be known when land uses, layouts and design are clarified at an application stage.

11.10 The assessment was based on the proposed land use type(s) in the individual site promotion which was then compared to the level of the harm the assessment attributed to that type of use. This was broken down in the study into 4 categories: Residential housing/ smaller flats, Medium-density residential flats, Higher-density residential flats/ small scale commercial and large scale commercial/ industrial/ distribution. Each category was given a rating of anticipated impact from low, low-moderate, moderate, moderate-high and high.

11.11 The extent of anticipated visual harm was therefore scored based on this assessment as follows:

Landscape sensitivity rating	HBC site matrix assessment score	Site suitability 
High	1	
Moderate-high	2	
Moderate	3	
Low-moderate	4	
Low	5	

**Compatibility with neighbouring land uses**

11.12 Due to the scale and varying nature of employment development, particularly B2 and B8 uses, the impact on neighbouring land uses (including any residential amenity) is considered to be of particular importance. This is reflected in the ‘agent of change’ principle in the NPPF (paragraph


<sup>30</sup> [Outline Landscape Appraisals Report Oct 2020 \(hertsmere.gov.uk\)](https://www.hertsmere.gov.uk/outline-landscape-appraisals-report-oct-2020)

193) which seeks to avoid new development adversely affecting the operation of an existing business or community facility.

- 11.13 The assessment has been based on consultation with the Council’s Environmental Health department and officers’ judgement of the potential suitability of allocating a site in relation to its impact on neighbours. Employment development is considered to have a potentially detrimental impact upon surrounding neighbouring land uses, particularly, residential receptors.
- 11.14 The location of employment development needs to be sensitively considered but it is not considered necessary to increase or decrease the weighting of this criterion as precise impacts are likely to be unknown without knowing end users and with some impacts, potentially, capable of mitigation at planning application stage.
- 11.15 The assessment was based on the proposed land use type in relation to the existing neighbouring land uses. Residential land uses were considered to be the most sensitive with other uses being less sensitive. The types of sensitivity we spilt into 3 categories of suitability from Low (Adjacent to residential and noise sensitive land use), Medium and High (Adjacent to employment).

**Assessing compatibility with neighbouring land uses – scoring**

11.16 The extent of anticipated harm has been reflected in the following scores:

Compatibility rating	HBC site matrix assessment score	Site suitability
Low	1	
Medium	3	
High	5	

## 12. Bringing the scoring together

12.1 The outputs from this exercise are set out in Appendix 9 and 10. Scores in each category for housing and employment development have each been aggregated to produce an overall score for each site. In some cases a number of sites score very similarly with only small differences between scores; this can sometimes be attributed to differing subjective judgements, but also to the fact that in many instances Green Belt sites in comparable locations will exhibit very similar characteristics. For these reasons the outputs from the scoring process are not individually ranked in order of preference.

### Site Selection

12.2 The outputs from this assessment and comparison process provide an important input to the process of site selection for the revised draft Plan. There are, however, a number of other factors which may moderate the results of this process and affect the relative priority for allocation of individual sites. These include:

- i. Technical factors / other constraints relating to each site and its location, which are largely addressed through the HELAA
- ii. Decisions concerning the overall Vision, spatial strategy, priorities and development targets on which the revised Plan is to be based
- iii. Corporate priorities
- iv. Neighbourhood plans / parish council priorities
- v. Other particular exceptional circumstances, specific to a site, which may justify its selection (or non-selection)

12.3 With regard to the first of these, other site specific factors / constraints include (in no particular priority order):

- vi. Agricultural land quality
- vii. Heritage assets
- viii. Landscape sensitivity (for housing),
- ix. Flood risk sequential and exception tests
- x. Natural environment designations – LNR, SSSI, LWS, TPO etc
- xi. Site characteristics which could not be viably mitigated (e.g. contamination, topography, lack of access)

These and other site characteristics affecting each site's relative priority for allocation are addressed in the HELAA.

## Appendices

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## **Appendix 1: Local Plan Vision and Strategic Objectives**

Our vision for Hertsmere sets out how our borough will sustainably develop and grow until 2040 whilst protecting and enhancing our valued qualities.

**To deliver a quality and sustainable environment, which is healthy, connected, resilient and economically viable and meets the needs of all our borough's communities to 2040 and beyond.**

Our Vision and Objectives are linked to eight key themes.

### **Future Hertsmere**

Through the Local Plan and related Council strategies we will positively plan for Hertsmere's future until 2040 - delivering a healthy, sustainable, connected, high quality and economically viable environment which meets the needs of all our borough's communities.

We will embrace and maximise our locational strengths, drawing on the benefits of our close proximity to London, whilst recognising our strong local identity and links to other parts of Hertfordshire. Our precious relationship with the surrounding countryside will be safeguarded and improved to offset the impact of any development.

Our growth will be supported by appropriate high-quality infrastructure to meet the needs of those who call Hertsmere home and those residents and businesses who seek to relocate here.

### **Housing Hertsmere**

We will work hard to make Hertsmere an attractive and more affordable place for all to live. With more affordable and social housing we will provide the right number of homes of appropriate size, price and tenure. New homes will be sustainably located and integrated into existing towns and villages and a in new settlement created at Bowmans Cross.

### **Working Hertsmere**

With a strong, competitive and growing local economy, suitable sites will be available to meet the needs of new and existing businesses. Business will be served by the infrastructure it needs to operate efficiently, grow and compete, and will have access to a skilled, healthy and productive workforce. Enhanced travel provision will give residents a greater choice of local employment opportunities. Town centres will be adaptable, vibrant, accessible and attractive destinations, providing a range of employment, retail, leisure and community facilities.

### **Green Hertsmere**

Our borough will be a more environmentally sustainable place. Combating climate change will be embedded in how we live, work, relax and travel. New development will be sustainably located and net zero carbon. Greater bus and bike provision with walkable destinations will reduce the need for cars. Efficient use will be made of land, with flood risk and all forms of pollution avoided, reduced and/or mitigated. Hertsmere's valued natural environment will be protected and enhanced.

### **Connected Hertsmere**

There will be a reduced need to travel, with homes, jobs and other day to day facilities easily reached by foot, cycle and public transport. People will have a real choice of sustainable travel options. There will be improved connectivity for non-private car journeys between neighbouring towns including greater use of developer-funded passenger transport and a reduced reliance on petrol and diesel vehicles. Carless town centre connectivity will be enhanced by our regular low-cost hybrid Hertsmere Hoppers.

### **Healthy Hertsmere**



Health and wellbeing will be embedded into every aspect of development, creating healthy, inclusive, connected places, spaces and buildings. Our communities will have opportunities to adopt healthy lifestyles and have access to a wide range of healthcare facilities enabling them to live well for longer.

### **Creative Hertsmere**

Hertsmere's reputation as a nationally and internationally recognised centre for the creative industries, centred on an expanding film and television industry in Borehamwood and Elstree will continue to grow. The area will be an attractive location for film and television production and a broad range of associated digital, creative and media-related businesses, offering employment for all skill levels, will be encouraged to thrive.

### **Distinctive Hertsmere**

Hertsmere's distinctive character as an area of both urban and rural communities, strategically located in close proximity to London but within a countryside setting, will remain. Towns and villages will be places which have retained and enhanced their valued individual identities. New development will respect this distinctiveness and will enhance the quality, usability and legibility of the built environment, contributing to the creation of a real sense of place.

The character and setting of heritage assets will be protected and enhanced and retained for future generations. The strategic Green Belt will be protected, the close relationship of urban and rural communities with surrounding countryside safeguarded and improvements made to the countryside and biodiversity to offset the impact of development.

The Vision is supported by Strategic Objectives identifying how the main issues faced by the borough and its communities will be addressed.

## Appendix 2: Strategic Objectives

1. Ensure that development meets identified needs sustainably, in locations which are or can be made to be the most accessible by sustainable modes of transport.
2. Ensure that development is well designed and inclusive, respecting local character, enhancing the local environment and encouraging the building of safe, strong and cohesive communities.
3. Enable the delivery of a minimum of 9,400 new homes of appropriate size, type and tenure to meet the needs of Hertsmere's diverse community, including the elderly, people with additional needs, and gypsies and travellers.
4. Secure the maximum viable provision of affordable and social homes, including those for rent, for those who are unable to access housing on the open market.
5. Ensure that all new homes are built in places where there is or will be safe and convenient access to schools, health facilities, shops, and other necessary services and facilities.
6. Deliver the first phase of a sustainable new settlement at Bowmans Cross.
7. Ensure the availability of sufficient and suitable land, premises, supporting infrastructure and appropriately skilled workforce to meet the needs of existing and new businesses of all sizes.
8. Provide more and increased choice of employment, training and education opportunities for a growing resident population, with enhanced links between local employers, colleges and schools.
9. Ensure that an expanding film and television industry delivers social, environmental and economic benefits for local communities.
10. Ensure that people can live and work within easy reach of accessible attractive open space.
11. Ensure that town centres are adaptable, thriving, attractive and accessible places that respond to social, economic and legislative change and continue to be a focus for providing for the needs of all Hertsmere's communities.
12. Reduce greenhouse gas emissions and promote the building of greener, more energy efficient, net-zero greenhouse gas emission homes, offices and commercial buildings to help minimise the impact of climate change.
13. Protect and enhance biodiversity and encourage the provision of an expanded green and blue infrastructure network.
14. Facilitate improvements in the physical and mental health of our communities and contribute to the reduction of health inequalities across the borough.
15. Encourage increasingly sustainable patterns of local travel behaviour, secure the provision of better opportunities to travel by foot, cycle and public transport and reduce the need to travel by unsustainable modes of transport.
16. Ensure the provision of infrastructure for increasing use of electric and other less-polluting forms of private transport.
17. Support the improvement and expansion of electronic infrastructure including high speed broadband.
18. Protect the Green Belt against inappropriate or unplanned development.
19. Retain the distinct and separate identities of towns and villages and ensure that new development reflects the size, pattern and character of the settlement in which they are located.
20. Conserve and enhance historic and culturally important heritage, including locally and nationally listed buildings and structures.

### Appendix 3: Site included in the assessment and comparison of Green Belt sites

HELAA site reference	Site address	Other (related) HELAA reference (if any)*
HEL0033-22	Land Rear of 18 Cobden Hill	HEL367
HEL0173-22	Greyhound Lane South Mimms	HEL173
HEL0222-22	5-23 Cobden Hill, Radlett	HEL222
HEL0360-22	Land South of Radlett Lane, Shenley	HEL360
HEL152	Lyndhurst Farm, Borehamwood	n/a
HEL161	Land east of Southgate Road	n/a
HEL162	south of Barnet Road PB	n/a
HEL175	Hartsbourne Country Club	n/a
HEL176	Former Bushey Golf and Country Club	n/a
HEL177	Dove Lane, PB	n/a
HEL181	Land adj Little Bushey Lane & Bournehall Ave (Compass Park)	n/a
HEL196	Land Adjacent to Wilton End Cottage, Radlett Lane	n/a
HEL197	Land north of Barnet Lane (west)	HEL197ab; HEL0197-22
HEL198	Land at Brickfields (Adjoining Moses Dell)	n/a
HEL201	land at Little Bushey Lane (Redrow)	n/a
HEL202	Site at Merry Hill Road	n/a
HEL205	Land at Town Farm	HEL385a
HEL209a	Land North of Barnet Lane (Barratt) - bigger one to the east	n/a
HEL211	Land North Side of Little Bushey Lane	n/a
HEL212	Land off Watford Rd Elstree	n/a
HEL214	Land south of Theobald St, Radlett	n/a
HEL215	Land West of Rossway Drive	n/a
HEL218	Organ Hall Farm, Borehamwood	HEL0218-22
HEL228a	St Albans Road, South Mimms (Inc in SM3)	n/a
HEL228b	St Albans Road, South Mimms (inc SM3)	n/a
HEL236	Rectory Farm (inc. HEL236a & b)	n/a
HEL251	Potters Bar Golf Club	n/a
HEL254/255	Rear of Blanche Lane	HEL0254-22
HEL274	Edgwarebury farm	HEL273-278
HEL318	Former Sunnybank School, PB	HEL0318-22
HEL320	Land Formerly Part of Earl and Cross Keys Farm, (north site)	n/a
HEL321	Land Part of Earls and Cross Keys Farm (South)	n/a
HEL336	Harts Farm, Little Bushey Lane	HEL0336-22
HEL337b	East of Farm Way Bushey (site 2)	n/a
HEL337c	East of Farm Way Bushey (site 1)	n/a
HEL341	Land West of Allum Lane (west of cemetery)	n/a
HEL347	Wrotham Park Land off Cowley Hill	n/a
HEL348	Shenley Grange (north)	HEL0348-22, HEL0348b-22

HELAA site reference	Site address	Other (related) HELAA reference (if any)*
HEL349	Shenley Grange (south)	HEL349X
HEL350x	Harperbury Hospital revised (N) (S2A) AMENDED POST PSHE	Previous versions of HEL350 and HEL389
HEL350Y	Harperbury Hospital revised (S) (S2B) AMENDED POST PSHE	Previous versions of HEL350 and HEL389
HEL355	Land south of Elstree Road (Heathbourne Green)	HEL0355-22
HEL357	Oxhey Lane	n/a
HEL358	Land south of Shenley Road	n/a
HEL359	Land north of Stapleton Road	n/a
HEL361	Wrotham Park Land West of Baker Steet I&O	n/a
HEL362	Wrotham Park West Barnet Road East Baker Street I&O	n/a
HEL369	Well End Lodge	HEL0369-22
HEL370	Land West of Shenley	HEL370(1)
HEL370 (1)	Land West of Shenley	HEL370
HEL375	Manor Road PB	n/a
HEL379	Kemprow Farm (whole site, includes 172a)	n/a
HEL382a/c	Tyttenhanger Estate	HEL382
HEL385a	South Mimms area NE of village (Gascoyne Cecil)	n/a
HEL385b	South Mimms area NW of village (Wrotham Park)	n/a
HEL385c	South Mimms area W of village (Popes Farm- HCC land)	HEL0385-22
HEL386	Gravel Allotments, Bushey	n/a
HEL390	Land adj to 52 Harris Lane	n/a
HEL393a	Land South of Allum Lane	HEL393; HEL0393-22
HEL393b	Land South of Allum Lane	HEL393; HEL0393-22
HEL506	South of Allum Lane ADJ to HEL341	n/a
HEL510	Melbury Stables	HEL0510-22
HEL516	South of Greyhound Lane	n/a
HEL602	Land North west of Elstree	n/a
HEL902	Land to rear of 31-61 Blanche Lane	n/a
HEL905	Bushey Hall Golf Course	HEL0905-22; HEL807
HEL1001-22	Land to South East of Merry Hill Road	n/a
HEL1007-22	Land east of Green Street	n/a
HEL1008-22	Land at Holly Cottage, Well End Road	n/a
HEL1011-22	Edgewarebury House Farm Elstree Hill South	n/a
HEL1014-22	Land east of Kailas (formerly the Marians), Barnet Lane, Elstree - Site D	n/a
HEL1015-22	The Leys, Barnet Lane, Elstree	n/a
HEL1021-22	Land north of Radlett Road, Radlett	n/a
HEL1024-22	Land North of Mount Way and Manor Way	n/a
HEL1025-22	Rydal Mount Lodge	n/a
HEL1028-22	Porters Park Golf Club (Site 1)	HEL220
HEL1029-22	Porters Park Golf Club (Site 2)	HEL220
HEL1032-22	Land at Battlers Green Farm	n/a

HELAA site reference	Site address	Other (related) HELAA reference (if any)*
HEL1033-22	Land at Wild Farm, Shenley	n/a
HEL1034-22	Shenleybury House	n/a
HEL1036b-22	Land at Stephenson Way, Bushey	HEL521
HEL1050-22	Land South of Merry Hill Road, Bushey	n/a
HEL1051-22	Land North of Barnet Lane, Elstree, Borehamwood, Herts, WD6 3RH	n/a
HEL1052-22	Land at Hill Farm, West of Watling Street, Radlett	n/a
HEL1053-22	Land South of Mimms Lane, Shenley	n/a
HEL1055-22	Home Farm, Radlett	HEL1026-22, HEL346
HEL1061-22	Land South of Radlett Lane and East of Wilton Farm Cottages, Shenley	n/a
HEL1062-22	Land Between Heathbourne Cottage and Oak Lodge, Bushey	n/a

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## Appendix 4: Housing sites not included in the assessment and comparison of Green Belt sites

### 1. Sites in the HELAA but not in site comparison matrix

Site ref.	Site name	Reason for exclusion from matrix
HEL0231-22	Starveacres	Not Green Belt (safeguarded). (Also a resubmission of HEL231)
HEL225	SE of track between Loom Lane and Brickfields	Access issues
HEL0180-22	Kemprow, between White House and Adelaide Lodge, Radlett Road, Aldenham	Small village site - different assessment
HEL0403-22	Newberries Car Park	Not Green Belt (urban) (Also a resubmission of HEL403 )
HEL0511-22	Land West of Vale Avenue, Borehamwood	Subject to JR re de-designation of village green (Also a resubmission of HEL511)
HEL160	Elstree Gate	Not Green Belt (urban)
HEL164	Fenny Slade	Isolated location, severance from urban area
HEL166	1 Elstree Way	Not Green Belt (urban)
HEL167	Manor Point	Not Green Belt (urban)
HEL179	Hilfield Lane, Patchetts Green	Small village site - different assessment
HEL199	Land at Church Lane, Aldenham Village	Small village site - different assessment
HEL204	Land at Stangate Crescent	Not Green Belt (urban)
HEL216	Land west of Potters Bar station	Not Green Belt (urban)
HEL217	Manor Place Industrial Estate	Not Green Belt (urban)
HEL219	Pegmire Lane, Patchetts Green	Small village site - different assessment
HEL219/252	Plots 47 and 48 Pegmire Lane	Small village site - different assessment
HEL221	Rabley Green	Not available
HEL226	NW of track between Loom Lane and Brickfields	Access issues
HEL234a	Well Cottage, Wagon Road	Small settlement below Settlement Hierarchy
HEL234b	Well Cottage, Dancers Hill Road (White House Site)	Small settlement below Settlement Hierarchy
HEL239	The Paddock, Elstree Road	Not Green Belt (urban)
HEL343a	Fields south of Letchmore Heath	Isolated location (Original site ref. HEL343)
HEL345	Aldenham Glebe, Roundbush	Small village site - different assessment
HEL371	The Old Haberdashers Sports Ground, Croxdale Road	Not Green Belt (urban)
HEL388	The Point	Not Green Belt (urban)
HEL501	Adjoining (Fenny Slade)	Not suitable (HELAA assessment)
HEL502	Birchville Cottage	Not Green Belt (safeguarded)
HEL504	Land East of St Albans Road	LWS. Not suitable (HELAA assessment)
HEL505	Greenacres	Not Green Belt (safeguarded)
HEL507	Kendal Hall Farm	Isolated location. Access not demonstrated (HELAA assessment)
HEL508	Land at 26 Woodhall Lane	Not available
HEL509	Little Simpsons, Letchmore Heath	Small village site - different assessment
HEL512	Norwegian Barn	Not suitable (HELAA assessment)
HEL514	Radlett Park Golf Course	Isolated location (also HEL0514-22)
HEL515	South of Rectory Farm Savills	LWS. Not suitable (HELAA assessment)
HEL700	Potters Bar regeneration	Not Green Belt (urban)
HEL907	Maxwell Park Youth and Community Centre	Not Green Belt (urban)
HEL908	Oakmere Youth and Community Centre	Not Green Belt (urban)
HEL909	Potters Bar Fire Station	Not Green Belt (urban)

Site ref.	Site name	Reason for exclusion from matrix
HEL910	The Park, ESC	Not Green Belt (urban)
HEL911	Elm Court Community Centre	Not Green Belt (urban)
HEL1003-22	Land at Magnolia Drive	Not Green Belt (urban)
HEL1005-22	Catterick Way, Borehamwood (HBC)	Not Green Belt (urban)
HEL1006-22	26-30 Theobald Street Borehamwood WD6 4SE	Not Green Belt (urban)
HEL1009-22	Instalcom House, Manor Way	Not Green Belt (urban)
HEL1010-22	Ham Farm, Hogg Lane, Elstree	Isolated location
HEL1018-22	Oxhey Option 2: Land at Paddock Road Allotments, Watford	Not available. Scheme requires development of/access through Watford part of site; not allocated in Watford LP.
HEL1020-22	The Fields, Theobald St	Isolated location
HEL1023-22	197 Darkes Lane Potters Bar	Not Green Belt (urban)
HEL1027-22	Land & garages rear 38-40 Watling Street	Not Green Belt (urban)
HEL1030-22	Porters Park Golf Club	Isolated location, LWS
HEL1035-22	The White Hart, St Albans Road	PDL
HEL1063-22	Cedar Chalet, Kendall Hall Farm, Radlett	Isolated location
HEL1100-22	EWC Elstree Way north	Not Green Belt (urban)
HEL1101-22	EWC Elstree Way south	Not Green Belt (urban)
HEL1102-22	EWC Civic Car Park	Not Green Belt (urban)
HEL1103-22	EWC Elstree Way / Bullhead Road	Not Green Belt (urban)
HEL1104-22	EWC Manor Way	Not Green Belt (urban)
HEL1106-22	Canada Life, Potters Bar	Not Green Belt (urban)
HEL1107-22	Kemp Place car park	Not Green Belt (urban)

## 2. Sites not in the HELAA or site comparison matrix

Site ref.	Site name	Reason for exclusion from matrix
HEL163	Evelyn House, Elstree Way, Borehamwood	No contact/further promotion
HEL170	Bushey Health Centre	Urban
HEL178	Rushfield, Potters Bar	Local Wildlife Site, not re-promoted
HEL200	Elton Way, A41, Bushey	Withdrawn
HEL203	Land at Rossway Drive, Bushey	Approved, urban,
HEL209b	Land north of Barnet Lane, Borehamwood	No further contact. Local Wildlife Site
HEL213	Land r/o The Ridgeway, Radlett	No contact/further promotion
HEL220	Porters Park Golf Club, Radlett	Superseded by HEL1028-22 to 1031-22
HEL223	75 Hatfield Road, Potters Bar	Below site threshold, urban, withdrawn
HEL224	Royal Connaught Park, Bushey	No contact / further promotion
HEL227	Little Orchard, Barnet Lane, Elstree	No longer available / not re-promoted
HEL233	Units 1 & 2 Borehamwood Industrial Park	No contact/further promotion
HEL235	Bushey Hall Garage	No longer available / promoted
HEL237	Hamilton Close, South Mimms	Urban location
HEL241	Land at South of Borehamwood	Superseded by HEL271-272, not promoted for Housing
HEL242	Land at South of Borehamwood	Superseded by HEL271-272, not promoted for Housing
HEL243	Land at Elstree and Aldenham reservoir	Superseded by HEL273-278, only HEL274 promoted for housing
HEL247	Land East of Shenley, land South of Ridge, land at Dyrham Park	Isolated location
HEL253	Land at Theobald Street	Isolated location
HEL316	HCC land - South Mimms - Popes Farm, Blanche Lane (West)	Not re-promoted
HEL317	HCC land - South Mimms - Popes Farm, Blanche Lane (East)	Superseded by HEL385c /HEL0385-22 (in matrix)

Site ref.	Site name	Reason for exclusion from matrix
HEL332	Tyttenhanger	Superseded by Bowmans Cross proposal HEL382a/c (in matrix)
HEL335	Land at Caldecote Farm	Below site threshold
HEL337a	Land east of Farm Way Bushey	Below site threshold
HEL340	Land east of Allum Lane, Elstree	Superseded by HEL0393-22, HEL393 a/b (in matrix)
HEL346	Home Farm, Radlett	Within (superseded by) HEL1055-22 (which is in HELAA & matrix).
HEL352	White House, South Mimms	No further contact. Below site threshold, heritage
HEL354	Land north of Fox Hollows	No contact/further promotion
HEL365	Land Adj Bridgefoot Cottages	Below site threshold, isolated location,
HEL367	Land west of Watling Street	Superseded by HEL0033-22
HEL376	Land off Well End Road, Borehamwood	Not promoted for housing - superseded by HEL818 Sky North and Hertswood Studios
HEL382d	Tyttenhanger estate south of M25	Superseded by Bowmans Cross proposals HEL382a-c
HEL384	Organ Hall Farm buildings, Borehamwood	Built
HEL389a	Harperbury Hospital revised (N)	Superseded see HEL350 (in matrix)
HEL389b	Harperbury Hospital revised (S)	Superseded See HEL350 (in matrix)
HEL513	Land off Oakfield Close Potters Bar	Below site threshold
HEL519a-b	Land at Bell Lane	Not promoted for housing - employment, open space
HEL601	Green Street, Borehamwood	Below site threshold
HEL901	Land to the North East of Aldenham GC	Not promoted for housing - medical/care duplicatesHEL1045-22
HEL903	Kendal Hall Farm	Part of HEL1063-22 Isolated location.
HEL904a-22	Harper Lodge Farm and land north of Radlett	Information submitted appears to indicate all housing is in SADC
HEL906	Bushey Fire Station and house	Below site threshold, urban,
HEL912	Land West of Watling Street	Not promoted for housing - leisure
HEL1002-22	Caldecote Farm Stables, Caldecote Lane	Below site threshold
HEL1004-22	The Cannon, Thirsk Road, Borehamwood	Below site threshold, urban
HEL1013-22	Land east of Kailas (formerly the Marians), Barnet Lane, Elstree B	Not promoted for housing - BNG
HEL1016-22	Land north of Butterfly Lane, Elstree	Not promoted for housing - Solar farm proposal
HEL1019-22	The Ridings Patchetts Green	Below site threshold
HEL1022-22	20-24 Mount Grace Road, Potters Bar	Insufficient detail, urban location
HEL1026-22	Land west of Watling Street	Within and superseded by HEL1055-22
HEL1031-22	Porters Park Golf Club, Radlett	Isolated location
HEL1036a-22	Land at Stephenson Way, Bushey	Not promoted for housing - Solar farm proposal
HEL1036c-22	Land at Stephenson Way, Bushey	Not promoted for housing - BNG
HEL1037a-d	Bushey Fire Station	Below site threshold
HEL1042-22 a,c,d,e	Willows Farm, London Colney	Not promoted for housing - leisure
HEL1043-22	Hilfield Park Reservoir	Not promoted for housing - leisure
HEL1043-22	Hilfield Park Reservoir (Affinity site 2)	Not promoted for housing - leisure/education)
HEL1045-22	Aldenham Golf Club	Not promoted for housing - medical/care duplicates HEL901
HEL1046-22	Watford FC Training Ground	Not promoted for housing - sporting facilities
HEL1048-22	Home Farm, Radlett	Registered Park and Garden
HEL1049-22	Land at Hillfield Lane	Not promoted for housing - commercial
HEL1060-22	Arsenal FC training ground	Not promoted for housing - sport/leisure)
HEL1064-22	Land to North and East of Kendall Hall Farm	BNG as part of HEL1063-22 Isolated location



## Appendix 5: Sites in small villages

Sites in lower levels of Settlement Hierarchy subject to separate Green Belt assessment which guides any allocations (see paragraph 6.6 of report)

HELAA ref	Site name
HEL0180-22	Kemprow, between White House and Adelaide Lodge, Radlett Road, Aldenham
HEL179	Hilfield Lane, Patchetts Green
HEL199	Land at Church Lane, Aldenham Village
HEL219	Pegmire Lane, Patchetts Green
HEL219/252	Plots 47 and 48 Pegmire Lane
HEL345	Aldenham Glebe, Roundbush
HEL509	Little Simpsons, Letchmore Heath

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## Appendix 6: Additional Green Belt assessment March 2024

HELAA ref	Site name
HEL0905-22	Bushey Hall Golf Club, Bushey
HEL202	Site at Merry Hill Road, Bushey
HEL224	Royal Connaught Park, Bushey
HEL512	Norwegian Barn, Elstree
HEL602	Land North west of Elstree
HEL904a	Harper Lodge Farm, Radlett
HEL1001-22	Land to south east of Merry Hill Road, Bushey
HEL1015-22	The Leys, Barnet Lane, Elstree
HEL1050-22	Land South of Merry Hill Road, Bushey

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## Appendix 7: Additional consultation with Infrastructure Providers February 2024

Sites which were not previously subject to consultation with Infrastructure Providers

HELAA ref	Site name
HEL516	Land south of Greyhound Lane, South Mims
HEL602	Land north west of Elstree Village
HEL902	Land to rear of 31-61 Blanche Lane
HEL905	Bushey Hall Golf Club, Bushey
HEL1001-22	Land to south east of Merry Hill Road, Bushey
HEL1007-22	Land east of Green Street, Borehamwood
HEL1008-22	Land at Holly Cottage, Well End Road
HEL1011-22	Edgewarebury House Farm Elstree Hill South
HEL1014-22	Land east of Kailas (formerly the Marians), Barnet Lane, Elstree - Site D
HEL1015-22	The Leys, Barnet Lane, Elstree
HEL1018-22	Oxhey Option 2: Land at Paddock Road Allotments, Watford
HEL1021-22	Land north of Radlett Road, Radlett
HEL1024-22	Land north of Mount Way and Manor Way, Potters Bar
HEL1025-22	Rydal Mount Lodge, Potters Bar
HEL1028-22	Porters Park Golf Club, Radlett
HEL1029-22	Porters Park Golf Club, Radlett
HEL1032-22	Land at Battlers Green Farm, Radlett
HEL1033-22	Land at Wild Farm, Shenley
HEL1034-22	Shenleybury House, Shenley
HEL1036b-22	Land at Stephenson Way, Bushey
HEL1050-22	Land South of Merry Hill Road, Bushey
HEL1051-22	Land North of Barnet Lane, Elstree, Borehamwood
HEL1052-22	Land at Hill Farm, West of Watling Street, Radlett
HEL1053-22	Land South of Mimms Lane, Shenley
HEL1055-22	Home Farm, Radlett
HEL1061-22	Land Adjoining Pounding House, 67 London Road, Shenley
HEL1062-22	Land Between Heathbourne Cottage and Oak Lodge, Bushey

## Appendix 8: Additional Sites subject to Sustainability Appraisal March 2024

Sites in the site comparison matrix which were either not previously subject to Sustainability Appraisal in 2021 or were included in 2021 but re-appraised in 2024 due to a change in the site area

HELAA ref	Address
HEL0360-22	Land south of Radlett Lane, Shenley
HEL152	Lyndhurst Farm, Borehamwood
HEL198*	Land at Brickfields (Adjoining Moses Dell)
HEL202*	Site at Merry Hill Road, Bushey
HEL321	Land Part of Earls and Cross Keys Farm (South)
HEL341	Land West of Allum Lane, Elstree Village
HEL902	Land to rear of 31-61 Blanche Lane, South Mimms
HEL905	Bushey Hall Golf Club, Bushey Hall Drive, Bushey
HEL0905-22	Bushey Hall Golf Club, Bushey Hall Drive, Bushey
HEL350Y	Harperbury Hospital
HEL1001-22	Land to south east of Merry Hill Road, Bushey
HEL1007-22*	Land east of Green Street, Borehamwood
HEL1008-22	Land at Holly Cottage, Well End Road, Well End
HEL1011-22	Edgwarebury House Farm, Elstree Hill South, Elstree Village
HEL1014-22	Land east of Kailas (formerly the Marians), Barnet Lane, Elstree - Site D
HEL1015-22	The Leys, Barnet Lane, Elstree
HEL1018-22	Oxhey Option 2: Land at Paddock Road Allotments, Watford
HEL1021-22	Land north of Radlett Road, Radlett
HEL1024-22	Land North of Mount Way and Manor Way
HEL1025-22	Rydal Mount Lodge, Potters Bar
HEL1028-22	Porters Park Golf Club, Radlett
HEL1029-22	Porters Park Golf Club, Radlett
HEL1032-22	Land at Battlers Green Farm, Radlett
HEL1033-22	Land at Wild Farm, Shenley
HEL1034-22	Shenleybury House, Shenley
HEL1036b-22	Land at Stephenson Way, Bushey
HEL1050-22	Land south of Merry Hill Road, Bushey
HEL1051-22	Land north of Barnet Lane, Elstree, Borehamwood
HEL1052-22	Land at Hill Farm, West of Watling Street, Radlett
HEL1053-22	Land south of Mimms Lane, Shenley
HEL1055-22	Home Farm, Radlett
HEL1061-22	Land Adjoining Pounding House, 67 London Road, Shenley
HEL1062-22	Land Between Heathbourne Cottage and Oak Lodge, Bushey
	* sites given an average Sustainability Appraisal score in site comparison matrix

**Appendix 9: Housing sites matrix**

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HELAA ref	Site name	Wider sub-area Strategic GB performance	Weighted score	Sub-area Performance against GB Objectives (Arup)	Weighted score	Recommended by Arup for further consideration	Weighted score	Accessibility to local services	Weighted score	Substantive transport issues	Weighted score	Flood risk issues	Weighted score	Statutory body - substantive other technical concerns / objections at R18	Weighted score	Sustainability Appraisal blended score	Weighted score	Unweighted score	Weighted Score
			x1.5		x1.5		x3		x0.75		1		x0.75		x1		x1.5		
HEL0033-22	Land Rear of 18 Cobden Hill, Radlett	1	1.5	3	4.5	1	3	1	0.75	3	3	5	3.75	5	5	1	1.5	20	23
HEL0222-22	5-23 Cobden Hill, Radlett	1	1.5	3	4.5	3	9	1	0.75	4	4	4	3	5	5	1	1.5	22	29.25
HEL0360-22	Land South of Radlett Lane, Shenley	3	4.5	1	1.5	3	9	1	0.75	4	4	4	3	3	3	5	7.5	24	33.25
HEL152	Lyndhurst Farm, Borehamwood	1	1.5	1	1.5	1	3	1	0.75	4	4	4	3	5	5	2	3	19	21.75
HEL161	Land east of Southgate Road, Potters Bar	4	6	3	4.5	5	15	2	1.5	3	3	4	3	4	4	3	4.5	28	41.5
HEL162	South of Barnet Road Potters Bar	5	7.5	5	7.5	5	15	2	1.5	4	4	4	3	5	5	1	1.5	31	45
HEL173-22	Greyhound Lane, South Mimms	5	7.5	5	7.5	5	15	2	1.5	4	4	4	3	4	4	2	3	31	45.5
HEL175	Hartsbourne Country Club, Bushey	1	1.5	1	1.5	1	3	1	0.75	5	5	5	3.75	4	4	1	1.5	19	21
HEL176	Former Bushey Golf and Country Club	1	1.5	3	4.5	1	3	3	2.25	4	4	4	3	5	5	3	4.5	24	27.75
HEL177	Dove Lane, Potters Bar	5	7.5	5	7.5	5	15	2	1.5	4	4	5	3.75	5	5	1	1.5	32	45.75
HEL181	Land adj Little Bushey Lane & Bournehall Ave (Compass Park), Bushey	1	1.5	1	1.5	1	3	3	2.25	3	3	5	3.75	3	3	5	7.5	22	25.5
HEL196	Land Adjacent to Wilton End Cottage, Radlett Lane	3	4.5	1	1.5	3	9	3	2.25	4	4	3	2.25	4	4	2	3	23	30.5
HEL197	Land north of Barnet Lane (west), Elstree	5	7.5	3	4.5	5	15	1	0.75	5	5	5	3.75	5	5	2	3	31	44.5
HEL198	Land at Brickfields (Adjoining Moses Dell), Radlett	1	1.5	3	4.5	1	3	1	0.75	3	3	5	3.75	5	5	3	4.5	22	26
HEL201	Land east of Little Bushey Lane (Redrow), Bushey	5	7.5	3	4.5	5	15	2	1.5	3	3	3	2.25	3	3	4	6	28	42.75
HEL202	Site at Merry Hill Road, Bushey	1	1.5	1	1.5	1	3	2	1.5	5	5	5	3.75	4	4	3	4.5	22	24.75
HEL205	Land at Town Farm, South Mimms	1	1.5	1	1.5	1	3	2	1.5	4	4	1	0.75	4	4	2	3	16	19.25
HEL209a	Land North of Barnet Lane	5	7.5	1	1.5	5	15	4	3	4	4	5	3.75	5	5	4	6	33	45.75
HEL211	Land North Side of Little Bushey Lane, Bushey	5	7.5	3	4.5	5	15	2	1.5	4	4	4	3	4	4	3	4.5	30	44
HEL212	Land off Watford Rd, Elstree	5	7.5	5	7.5	5	15	2	1.5	3	3	5	3.75	5	5	2	3	32	46.25
HEL214	Land south of Theobald St, Radlett	3	4.5	3	4.5	5	15	3	2.25	5	5	3	2.25	5	5	3	4.5	30	43
HEL215	Land West of Rossway Drive, Bushey	5	7.5	5	7.5	5	15	2	1.5	5	5	5	3.75	4	4	2	3	33	47.25
HEL218	Organ Hall Farm, Borehamwood	5	7.5	3	4.5	5	15	2	1.5	4	4	3	2.25	4	4	2	3	28	41.75
HEL228a	St Albans Road, South Mimms (Inc in SM3)	1	1.5	1	1.5	1	3	3	2.25	4	4	2	1.5	5	5	2	3	19	21.75
HEL228b	St Albans Road, South Mimms (Inc SM3)	1	1.5	1	1.5	1	3	2	1.5	4	4	2	1.5	5	5	2	3	18	21
HEL236	Rectory Farm (inc. HEL236a & b), Shenley	1	1.5	1	1.5	1	3	2	1.5	5	5	4	3	5	5	5	7.5	24	28
HEL251	Former Potters Bar Golf Club	5	7.5	3	4.5	5	15	3	2.25	4	4	3	2.25	5	5	4	6	32	46.5
HEL254/255	Rear of Blanche Lane, South Mimms	5	7.5	3	4.5	5	15	2	1.5	3	3	4	3	5	5	1	1.5	28	41
HEL274	Edgewarebury farm, Elstree Village	3	4.5	3	4.5	3	9	2	1.5	3	3	4	3	5	5	2	3	25	33.5
HEL318	Former Sunnybank School, Potters Bar	5	7.5	5	7.5	5	15	2	1.5	5	5	5	3.75	3	3	3	4.5	33	47.75
HEL320	Land Formerly Part of Earl and Cross Keys Farm, (north site), South Mimms	5	7.5	3	4.5	5	15	3	2.25	4	4	5	3.75	5	5	3	4.5	33	46.5
HEL321	Land Part of Earls and Cross Keys Farm (South), South Mimms	3	4.5	3	4.5	3	9	3	2.25	4	4	4	3	4	4	2	3	26	34.25

HELAA ref	Site name	Wider sub-area Strategic GB performance		Sub-area Performance against GB Objectives (Arup)		Recommended by Arup for further consideration		Accessibility to local services		Substantive transport issues		Flood risk issues		Statutory body - substantive other technical concerns / objections at R18		Sustainability Appraisal blended score			
HEL336	Harts Farm, Little Bushey Lane, Bushey	5	7.5	3	4.5	5	15	2	1.5	3	3	3	2.25	3	3	4	6	28	42.75
HEL337b	East of Farm Way Bushey (site 2)	1	1.5	1	1.5	1	3	2	1.5	5	5	5	3.75	5	5	3	4.5	23	25.75
HEL337c	East of Farm Way Bushey (site 1)	1	1.5	1	1.5	1	3	2	1.5	5	5	5	3.75	5	5	3	4.5	23	25.75
HEL341	Land West of Allum Lane (west of cemetery), Elstree Village	3	4.5	1	1.5	3	9	4	3	5	5	5	3.75	3	3	4	6	28	35.75
HEL347	Land off Cowley Hill (Wrotham Park Estate), Borehamwood	3	4.5	3	4.5	3	9	2	1.5	4	4	4	3	5	5	5	7.5	29	39
HEL348	Shenley Grange (north)	3	4.5	1	1.5	3	9	2	1.5	3	3	4	3	5	5	2	3	23	30.5
HEL349	Shenley Grange (south)	3	4.5	1	1.5	3	9	2	1.5	3	3	4	3	5	5	2	3	23	30.5
HEL350	Harperbury Hospital revised (X and Y)	1	1.5	3	4.5	1	3	1	0.75	1	1	3	2.25	3	3	2	3	15	19
HEL355	Land south of Elstree Road (Heathbourne Green), Bushey Heath	1	1.5	3	4.5	1	3	1	0.75	3	3	4	3	4	4	5	7.5	22	27.25
HEL357	Oxhey Lane, Oxhey	3	4.5	1	1.5	3	9	1	0.75	2	2	3	2.25	3	3	1	1.5	17	24.5
HEL358	Land south of Shenley Road, Radlett	4	6	3	4.5	5	15	3	2.25	3	3	4	3	4	4	2	3	28	40.75
HEL359	Land north of Stapleton Road, Borehamwood	1	1.5	1	1.5	1	3	2	1.5	4	4	4	3	4	4	3	4.5	20	23
HEL361	Land West of Baker Steet (Wrotham Park Estate), Potters Bar	1	1.5	1	1.5	1	3	1	0.75	3	3	3	2.25	4	4	4	6	18	22
HEL362	West of Barnet Road, East of Baker Street (Wrotham Park Estate), Potters Bar	5	7.5	3	4.5	5	15	2	1.5	3	3	4	3	5	5	5	7.5	32	47
HEL369	Well End Lodge, Well End, Borehamwood	3	4.5	3	4.5	3	9	1	0.75	5	5	5	3.75	5	5	2	3	27	35.5
HEL370	Land West of Shenley	1	1.5	1	1.5	3	9	1	0.75	5	5	4	3	2	2	1	1.5	18	24.25
HEL370(1)	Land to West of Shenley	1	1.5	1	1.5	1	3	1	0.75	3	3	4	3	5	5	1	1.5	17	19.25
HEL375	Manor Road, Potters Bar	3	4.5	3	4.5	3	9	3	2.25	4	4	5	3.75	5	5	4	6	30	39
HEL379	Kemprow Farm (whole site, includes 172a), Watford Road, Radlett	1	1.5	1	1.5	1	3	3	2.25	3	3	4	3	5	5	3	4.5	21	23.75
HEL382a/c	Tyttenhanger Estate	2.5	3.75	2.5	3.75	3	9	2	1.5	1	1	3	2.25	2	2	4	6	20	29.25
HEL385a	South Mimms area north of village (Gascoyne Cecil)	1	1.5	1	1.5	1	3	2	1.5	4	4	4	3	5	5	2	3	20	22.5
HEL385b	South Mimms area North West of village (Wrotham Park Estate)	1	1.5	1	1.5	1	3	2	1.5	4	4	3	2.25	5	5	2	3	19	21.75
HEL385c	South Mimms area west of village (Popes Farm- HCC land)	1	1.5	1	1.5	1	3	2	1.5	4	4	2	1.5	5	5	3	4.5	19	22.5
HEL386	Gravel Allotments, Bushey Heath	5	7.5	5	7.5	5	15	1	0.75	5	5	5	3.75	5	5	1	1.5	32	46
HEL390	Land adjacent to 52 Harris Lane, Shenley	3	4.5	1	1.5	5	15	2	1.5	4	4	4	3	5	5	2	3	26	37.5
HEL393a	Land South of Allum Lane, Elstree	3	4.5	1	1.5	3	9	3	2.25	4	4	4	3	4	4	3	4.5	25	32.75
HEL393b	Land South of Allum Lane, Elstree	3	4.5	1	1.5	3	9	3	2.25	4	4	4	3	4	4	3	4.5	25	32.75
HEL506	South of Allum Lane Adjacent to HEL341	3	4.5	1	1.5	3	9	4	3	4	4	5	3.75	3	3	2	3	25	31.75
HEL510	Melbury Stables, Bushey	5	7.5	3	4.5	5	15	1	0.75	5	5	5	3.75	5	5	1	1.5	30	43
HEL516	South of Greyhound Lane, South Mimms	5	7.5	5	7.5	5	15	2	1.5	2	2	4	3	2	2	2	3	27	41.5
HEL602	Land North west of Elstree Village	5	7.5	1	1.5	5	15	3	2.25	3	3	4	3	2	2	1	1.5	24	35.75
HEL902	Land to rear of 31-61 Blanche Lane, South Mimms	5	7.5	5	7.5	5	15	2	1.5	3	3	5	3.75	3	3	3	4.5	31	45.75
HEL905	Bushey Hall Golf Course, Bushey	1	1.5	1	1.5	1	3	2	1.5	3	3	5	3.75	2	2	5	7.5	20	23.75
HEL1001-22	Land to South East of Merry Hill Road	1	1.5	1	1.5	1	3	2	1.5	4	4	4	3	2	2	3	4.5	18	21

HELAA ref	Site name	Wider sub-area Strategic GB performance		Sub-area Performance against GB Objectives (Arup)		Recommended by Arup for further consideration		Accessibility to local services		Substantive transport issues		Flood risk issues		Statutory body - substantive other technical concerns / objections at R18		Sustainability Appraisal blended score			
HEL1007-22	Land east of Green Street, Borehamwood	1	1.5	1	1.5	1	3	2	1.5	3	3	5	3.75	5	5	3	4.5	21	23.75
HEL1008-22	Land at Holly Cottage, Well End Road	3	4.5	1	1.5	3	9	1	0.75	3	3	5	3.75	5	5	3	4.5	24	32
HEL1011-22	Edgewarebury House Farm Elstree Hill South, Elstree Village	3	4.5	3	4.5	5	15	3	2.25	4	4	5	3.75	4	4	3	4.5	30	42.5
HEL1014-22	Land east of Kailas (formerly the Marians), Barnet Lane, Elstree - Site D	3	4.5	1	1.5	3	9	1	0.75	3	3	5	3.75	5	5	4	6	25	33.5
HEL1015-22	The Leys, Barnet Lane, Elstree	1	1.5	3	4.5	1	3	1	0.75	3	3	4	3	2	2	2	3	17	20.75
HEL1021-22	Land north of Radlett Road, Radlett	1	1.5	5	7.5	1	3	1	0.75	2	2	5	3.75	4	4	3	4.5	22	27
HEL1024-22	Land North of Mount Way and Manor Way, Potters Bar	5	7.5	3	4.5	5	15	3	2.25	4	4	4	3	4	4	4	6	32	46.25
HEL1025-22	Rydal Mount Lodge, Potters Bar	5	7.5	5	7.5	5	15	3	2.25	5	5	5	3.75	4	4	4	6	36	51
HEL1028-22	Porters Park Golf Club (Site 1), Radlett	1	1.5	1	1.5	1	3	2	1.5	3	3	1	0.75	2	2	4	6	15	19.25
HEL1029-22	Porters Park Golf Club (Site 2), Radlett	1	1.5	1	1.5	1	3	3	2.25	5	5	5	3.75	5	5	4	6	25	28
HEL1032-22	Land at Battlers Green Farm, Radlett	1	1.5	3	4.5	1	3	3	2.25	4	4	5	3.75	4	4	5	7.5	26	30.5
HEL1033-22	Land at Wild Farm, Shenley	1	1.5	3	4.5	1	3	1	0.75	3	3	4	3	4	4	5	7.5	22	27.25
HEL1034-22	Shenleybury House, Shenley	1	1.5	3	4.5	1	3	2	1.5	5	5	3	2.25	5	5	3	4.5	23	27.25
HEL1036b-22	Land at Stephenson Way, Bushey	5	7.5	5	7.5	5	15	1	0.75	3	3	5	3.75	3	3	5	7.5	32	48
HEL1050-22	Land South of Merry Hill Road, Bushey	3	4.5	3	4.5	3	9	2	1.5	2	2	4	3	2	2	3	4.5	22	31
HEL1051-22	Land North of Barnet Lane, Elstree	3	4.5	1	1.5	1	3	2	1.5	2	2	5	3.75	3	3	4	6	21	25.25
HEL1052-22	Land at Hill Farm, West of Watling Street, Radlett	1	1.5	1	1.5	1	3	1	0.75	3	3	2	1.5	5	5	4	6	18	22.25
HEL1053-22	Land South of Mimms Lane, Shenley	3	4.5	3	4.5	3	9	1	0.75	2	2	5	3.75	4	4	2	3	23	31.5
HEL1055-22	Home Farm, Radlett	1	1.5	1	1.5	1	3	1	0.75	3	3	4	3	3	3	5	7.5	19	23.25
HEL1061-22	Land South of Radlett Lane and East of Wilton Farm Cottages, Shenley	3	4.5	1	1.5	3	9	2	1.5	3	3	4	3	4	4	3	4.5	23	31
HEL1062-22	Land Between Heathbourne Cottage and Oak Lodge, Bushey	5	7.5	5	7.5	5	15	1	0.75	4	4	5	3.75	2	2	3	4.5	30	45



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HELAA ref	Site name	Wider sub-area Strategic GB performance	Weighted score	Sub-area Performance against GB Objectives (Arup)	Weighted score	Recommended by Arup for further consideration	Weighted score	Accessibility to Public Transport	Weighted score	Substantive transport issues	Weighted score	Flood risk issues	Weighted score	Statutory body - substantive other technical concerns / objections at R18	Weighted score	Sustainability Appraisal blended score	Weighted score	Landscape Sensitivity	Weighted score	Compatibility of Neighbouring uses	Weighted score	Unweighted score	Weighted Score
			x2		x2		x4		x0.75		x1		x0.75		x1		x1.5		x1		x1		
HEL208-22	Elton Way, A41, Bushey	5	10	3	6	5	20	4	3	4	4	5	3.75	4	4	1	1.5	2	2	3	3	36	57.25
HEL211	Land on the north side of Little Bushey Lane, Bushey	5	10	3	6	5	20	5	3.75	4	4	4	3	4	4	3	4.5	2	2	4	4	39	61.25
HEL238	Dagger Lane, A41, Elstree	1	2	3	6	1	4	4	3	3	3	4	3	3	2	3	1	1	3	3	25	31	
HEL503	Land adjacent to Lismirrane Industrial Estate, Elstree	5	10	5	10	5	20	5	3.75	4	4	2	1.5	4	4	2	3	2	2	5	5	39	63.25
HEL520b	Land to the South East of Costco, Bushey	1	2	3	6	1	4	4	3	5	5	4	3	5	5	2	3	2	2	4	4	31	37
HEL600-22	Charleston Paddocks, South Mimms	5	10	5	10	5	20	5	3.75	2	2	3	2.25	3	3	3	4.5	2	2	4	4	37	61.5
HEL806	Land East of Furze field Wood, Potters Bar	5	10	5	10	5	20	5	3.75	4	4	5	3.75	3	3	3	4.5	3	3	4	4	42	66
HEL809	Land East of Rowley Lane, Borehamwood	1	2	3	6	1	4	5	3.75	4	4	4	3	3	3	2	3	2	2	3	3	28	33.75
HEL811	Land to the West of Gullimore Farm, Borehamwood	5	10	3	6	5	20	3	2.25	3	3	3	2.25	4	4	2	3	2	2	3	3	33	55.5
HEL812	Land to East of Southgate Road, Potters Bar	5	10	3	6	5	20	5	3.75	2	2	4	3	3	3	2	3	2	2	3	3	34	55.75
HEL813	Land South of Barnet Road, Potters Bar	5	10	5	10	5	20	4	3	4	4	4	3	3	3	2	3	2	2	4	4	38	62
HEL817	Rectory Farm, Shenley	1	2	1	2	1	4	4	3	4	4	4	3	5	5	1	1.5	1	1	3	3	25	28.5
HEL818	Land South of Rowley Lane, Borehamwood	1	2	3	6	1	4	5	3.75	4	4	5	3.75	3	3	3	4.5	2	2	4	4	31	37
HEL1036b-22	Land at Stephenson Way, Bushey	5	10	5	10	5	20	5	3.75	4	4	5	3.75	3	3	3	4.5	1	1	3	3	39	63
HEL1036d-22	Land at Stephenson Way, Bushey	1	2	5	10	1	4	4	3	4	4	4	3	3	3	3	4.5	1	1	3	3	29	37.5
HEL1038-22	NAWT, Tylers Way, A41, Bushey	3	6	3	6	3	12	3	2.25	3	3	4	3	5	5	3	4.5	2	2	3	3	32	46.75
HEL1040-22 (HEL171)	Land To The South Of Aldenham Reservoir	1	2	3	6	1	4	5	3.75	4	4	3	2.25	4	4	1	1.5	1	1	4	4	27	32.5